CITY OF ISSAQUAH WASHINGTON

Community Planning & Development Department
1775 – 12th Ave. NW | P.O. Box 1307
Issaquah, WA 98027
425-837-3100
issaquahwa.gov

CITY OF ISSAQUAH

LAND USE APPLICATION
PROJECT NO. PRJ19-00008
FILE NOS. SDP20-00001, MSP20-00001, AAS20-00012, AAS21-00001, AAS21-00002, AAS21-00005, & AAS20-00006

Issue Date: February 16, 2022

ISSAQUAH HIGH SCHOOL #4 & ELEMENTARY SCHOOL #17
PROVIDENCE HEIGHTS
4221 228TH AVENUE SE

Table of Contents

Figures

Tables

Attachments

The following are Attachments entered into the record prior to publication of this staff report on February 16, 2022:

Site Development Permit (Permit no. SDP20-00001):

1. Site Development Permit Application (SDP20-00001), submitted October 2, 2020
2. Site Development Permit Submittal Checklist, submitted October 6, 2020
3. Project Narrative, submitted May 25, 2021
4. Design Criteria Narrative prepared by AHBL, dated May 21, 2021
5. Design Criteria Checklist Narrative prepared by AHBL, dated February 24, 2021
6. Sustainable Development Narrative, submitted October 6, 2020
7. WSSP Scorecard, submitted May 25, 2021
8. Comprehensive Plan Narrative prepared by AHBL, dated February 22, 2021
9. Pre-App Comment Responses prepared by AHBL, dated September 25, 2020
10. Pre-App Response Site Plan prepared by AHBL, dated July 31, 2020
11. Transportation Concurrency Certificate Application with Trip Calculator, submitted October 6, 2020
12. List of Development Adjustments Requested, submitted June 16, 2021
13. Certificate of Sewer Availability, submitted October 6, 2020
14. Certificate of Water Availability, submitted October 6, 2020
15. Sammamish Plateau Water & Sewer Developer Extension Agreement Letter dated October 20, 2020 and Resolution dated September 14, 2020
16. Sammamish Plateau Water and Sewer Approval Letter, dated December 14, 2020
17. Community Facilities Standards for Nonutility Community Facilities prepared by Issaquah School Districted, dated May 19, 2021
18. Land Use Response Letter, dated February 22, 2021

Master Site Plan (Permit no. MSP20-00001)

19. Master Site Plan Application (MSP20-00001), submitted October 2, 2020
20. Master Site Plan Submittal Checklist, submitted June 16, 2021

Administrative Adjustment of Standards—Floor Area Ratio (Permit no. AAS20-00012)

21. AAS Application (AAS20-00012), submitted September 25, 2020
22. Narrative Response to AAS Criteria, dated May 19, 2021

Administrative Adjustment of Standards—Tree Retention Modification (Permit no. AAS21-00001)

23. AAS Application (AAS21-00001), submitted March 4, 2021
24. AAS Land Use Permit Application, dated March 3, 2021
25. Narrative Response to AAS Criteria, dated March 3, 2021

Administrative Adjustment of Standards—Shared Parking (Permit no. AAS21-00002)

26. AAS Application (AAS21-00002), submitted March 4, 2021

27. AAS Land Use Permit Application, dated March 3, 2021
28. Narrative Response to AAS Criteria prepared by AHBL, dated June 10, 2021
29. Request to Use Shared Parking per IMC 18.09.070.C prepared by AHBL, dated September 25, 2020

Administrative Adjustment of Standards—Modification of Continuous Walkways (Permit no. AAS21-00005)

30. AAS Application (AAS21-00005), submitted May 21, 2021
31. Narrative Response to AAS Criteria prepared by AHBL, dated May 21, 2021

Administrative Adjustment of Standards—Modification of Pedestrian Frontage Connections (Permit no. AAS21-00006)

32. AAS Application (AAS21-00006), submitted May 21, 2021
33. Narrative Response to AAS Criteria prepared by AHBL, dated May 21, 2021

General Property Information

34. Affidavit of Ownership/Agent Authority, dated May 27, 2020
35. Title Report, dated August 18, 2020
36. Legal Description, submitted October 6, 2020
37. Transportation Concurrency Certificate, Issued September 1, 2021

Technical Studies and Reports

38. Critical Area Study & Wetland Mitigation Plan prepared by Wetland Resources Inc., dated July 10, 2020 and revised February 22, 2021
39. Third-Party Peer Review Approval from Herrera, Inc., dated March 19, 2021
40. Addendum to the Critical Area Study and Wetland Mitigation Plan for Issaquah School District – High School #4 and Elementary School #17, dated February 22, 2021, dated July 30, 2021
41. Third-Party Peer Review Approval from Herrera, Inc. dated August 3, 2021
42. Geotechnical Report prepared by AESI, dated September 17, 2019 and revised June 17, 2021
43. Landslide Hazard Assessment prepared by AESI, dated September 24, 2019
44. Third-Party Peer Review Approval from Wood, LLC, dated June 30, 2021
45. Third-Party Peer Review Comments Resolution from Wood, LLC, dated June 30, 2021
46. Noise Study prepared by The Greenbusch Group, Inc., dated September 2, 2020
47. Noise Study Approval from Doug Schlepp, dated December 17, 2020
48. Noise Study Addendum prepared by The Greenbusch Group, dated November 24, 2021
49. Football Field Acoustics Draft Memo, prepared by The Greenbusch Group, Inc., dated November 24, 2021
50. Tree Evaluation and Retention Report prepared by Zsofia Pasztor, dated April 2021
51. Third-Party Peer Review Approval from Urban Forestry Services, dated May 7, 2021
52. Tree Retention Notes prepared by Zsofia Pasztor and AHBL, dated September 2021 (Referred to as the "Small Tree Survey" in this Staff Report)

53. Preliminary On-Site Stormwater Technical Information Report prepared by AHBL, dated September 2020 and revised May 2021
54. Preliminary Off-Site Stormwater Technical Information Report prepared by AHBL, dated May 2021
55. Issaquah TIR/Sammamish TIR Discussion Memo prepared by AHBL, dated August 20, 2021
56. Stormwater System and Potential Impact to Laughing Jacobs Creek Letter, prepared by Wetland Resources, Inc., dated September 10, 2021
57. Laughing Jacobs Creek Project Discharge Memo, prepared by AHBL, dated September 7, 2021
58. Water Tower Lead in Soil Screening Summary prepared by PBS, dated March 3, 2020
59. Phase 1 Environmental Site Assessment, prepared by AESI, dated October 12, 2021
60. Revised Transportation Technical Report prepared by Heffron Transportation Inc., dated February 16, 2021
61. Third-Party Peer Review Approval from Transpo, Inc., dated March 24, 2021
62. Updated Traffic Analysis for 228th Avenue SE Near Site Memo ("Traffic Analysis Memo") prepared by Heffron Transportation Inc., dated May 18, 2021
63. Potential Neighborhood Traffic Calming Measures Memo prepared by Heffron Transportation Inc., dated May 10, 2021
64. Site Access Analysis Memo prepared by Heffron Transportation Inc., dated June 10, 2020
65. Trip Generation and Distribution – Updated Memo prepared by Heffron Transportation Inc., dated June 9, 2020
66. Traffic Analysis Supplement prepared by Transportation Solutions, Inc., dated April 26, 2021
67. Approved Deviation from Public Works Standards – Intersection Spacing, dated August 26, 2021
68. Exterior Lighting Memo prepared by TFWB Engineers, dated September 28, 2021
69. Athletic Field Lighting Letter prepared by Musco Lighting, dated November 12, 2021
70. Solar Access Analysis Memo prepared by Bassetti Architects, dated September 2, 2021
71. Greenhouse Gas Emissions Worksheet, prepared by AHBL, dated November 12, 2021
72. Construction Phasing and Sequencing Memo prepared by AHBL, dated February 8, 2022

Environmental Review

73. SEPA Lead Agency Memo prepared by AHBL, dated August 25, 2020
74. Final SEPA Threshold Determination issued by Issaquah School District on January 17, 2022
75. SEPA Checklist prepared by Issaquah School District on June 22, 2021 and revised on November 12, 2021

Legal Notices

76. Notice of Community Conference (COM20-00001, PRJ19-00008), issued July 6, 2020
77. Notice of Application (PRJ19-00008, MSP20-00001, SDP20-00001, AAS20-00011, AAS20-00012, AAS20-00013), dated October 20, 2020

78. Notice of Environmental Neighborhood Meeting (PRJ19-00008, SDP20-00001, MSP20-00001), issued April 16, 2021
79. Notice of Application (PRJ19-00008, AAS20-00012, AAS21-00001, AAS21-00002, AAS21-00005, AAS21-00006), dated June 16, 2021
80. Notice of Public Hearing (PRJ19-00008, SDP20-00001, MSP20-00001, AAS20-00012, AAS21-00001, AAS21-00002, AAS21-00005, AAS21-00006), issued February 16, 2022

Public Comments, Community Conference, and Environmental Neighborhood Meeting Information

81. Public Comments Summary Matrix
82. COM20-00001: Public Comments Received July 3-July 23, 2020
83. COM20-00001: Public Comment Summary Memo Responses, dated July 27, 2020
84. NM21-00002: Public Comments Received April 23-May 1, 2021
85. NM21-00002: Meeting Handout, dated April 28, 2021
86. NM21-00002: Meeting Notes, dated April 28, 2021
87. NM21-00002: Natural Environment Checklist, dated May 4, 2021
88. All Other Public Comments

Graphic Figures and Drawings Other than Plan Sets

89. Site Vicinity Map prepared by AHBL, dated June 12, 2020
90. Existing Site Aerial, submitted June 16, 2021
91. Exterior Colors and Materials Sample Board prepared by Bassetti Architects, submitted October 6, 2020
92. Perspective Drawings (Color Rendering) – Birds Eye Perspective from Ball Fields, submitted October 6, 2020
93. Site Fire Apparatus Turning Movements prepared by AHBL, submitted May 25, 2021
94. Impervious Surface Diagram, submitted July 22, 2021
95. View Vista Diagram, submitted July 19, 2021
96. Site Amenities and Materials Board prepared by Bassetti, dated September 2, 2020

Plans and Drawings

97. Civil Plans prepared by AHBL, dated September 25, 2020 and revised May 21, 2021
98. Architectural Plans & Building Elevations prepared by Bassetti Architects, dated May 2021
99. Landscape Plans, dated February 22, 2021 and revised May 21, 2021
100. Perspective Drawings (Black & White), prepared by Bassetti Architects, submitted June 16, 2021
101. Electrical Site Plans, dated April 16, 2021

STAFF REPORT

I. Application Information

Applications:	Project No.:	PRJ19-00008
	Site Development Permit:	SDP20-00001
	Master Site Plan:	MSP20-00001
	AAS – Floor Area Ratio:	AAS20-00001
	AAS – Tree Retention:	AAS21-00001
	AAS – Shared Parking:	AAS21-00002
	AAS – Continuous Walkways:	AAS21-00005
	AAS – Frontage Connections:	AAS21-00006

Project Name: ISD High School #4 & Elementary School #17 (Providence Heights)

Staff Contact: Cristina Haworth, AICP, Planning Consultant
cristinah@issaquahwa.gov

Lucy Sloman, AICP, Planning Manager
lucys@issaquahwa.gov

Emily Appleton, PE, Development Engineering Manager
emilya@issaquahwa.gov

Stacey Rush, PE, CFM, Senior Engineer
staceyr@issaquahwa.gov

Applicant: AHBL
Todd Sawin, PE
2215 N 30th Street
Tacoma, WA 98403
tsawin@ahbl.com

Owner: Issaquah School District No. 411
5150 220th Avenue SE
Issaquah, WA 98029

Project Description: Construction of a new consolidated high school and elementary school campus serving approximately 2,000 students and including sports stadium with lighting, tennis courts with lighting, unlit sports fields, outdoor learning spaces, structured and surface parking, utility upgrades, new pedestrian and vehicular facilities, and related improvements. The Applicant is requesting adjustments to requirements for floor area ratio, tree retention, parking minimums, nonmotorized walkways along internal

circulation facilities, and nonmotorized connections along public street frontage.

Location: Former Providence Heights College site
4221 228th Avenue SE (see Attachment 89, Site Vicinity Map).

Existing Land Use: Vacant following demolition of Providence Heights College buildings

Adjacent Uses: *See Figure 1, Vicinity Map with Zoning Designations*
- North: Providence Point retirement community; Bellewood assisted living community; some commercial
- South: Providence Point retirement community
- East: 228th Avenue SE; City of Sammamish single-family residential neighborhood
- West: Providence Point retirement community

Zoning: CF-F (Community Facilities – Facilities)

Comprehensive Plan:
- Land Use: Community Facilities
- Subarea: Providence Point

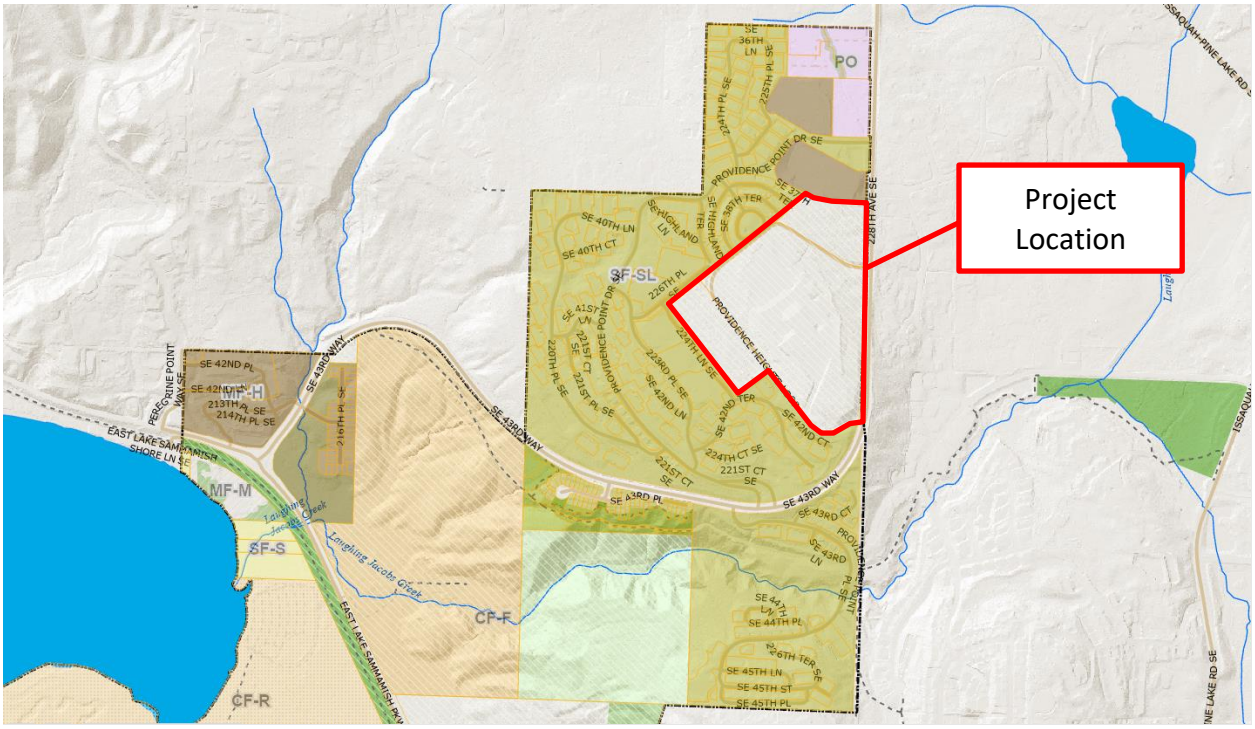


Figure 1: Vicinity Map with Zoning Designations.

II. Recommendation

Based upon the application, plans, drawings, technical studies, and related materials and the analysis presented in this Staff Report, the Administration recommends **APPROVAL SUBJECT TO CONDITIONS for SDP20-00001, MSP20-00001, AAS21-00012, AAS21-00001, AAS21-00002, AAS21-00005, and AAS21-00006.** Recommended conditions are included in Section X.A of this Staff Report.

III. Definitions and Table of Acronyms

A. Definitions

Abbreviated definitions for select technical terms used in this Staff Report are included in footnotes throughout the report. Terms are defined in IMC 18.02 *Definitions*, IMC 18.10.390 *Definitions*, CIDDS Chapter 2.0 *Definitions* (where applicable), and elsewhere in the Issaquah Municipal Code.[1] Refer to the applicable code section for the complete definition, or for the definition of other terms not defined in this Staff Report.

B. Table of Acronyms

Acronym	Meaning
AAS	Administrative Adjustment of Standards
ADA	Americans with Disabilities Act
AESI	Associated Earth Sciences, Inc.
CARA	Critical Aquifer Recharge Area
CF-F	Community Facilities – Facilities zoning district
CF-O	Community Facilities – Open Space zoning district
CIDDS	Central Issaquah Development and Design Standards
CMTP	Construction Management Transportation Plan
COW	Cell on Wheels
CPD	Community Planning & Development
CPTED	Crime Prevention through Environmental Design
DBH	Diameter at Breast Height
DEA	Developer Extension Agreement
DNS	Determination of Nonsignificance
EF&R	Eastside Fire & Rescue
ELSMB	East Lake Sammamish Mitigation Bank
ESA	Environmental Site Assessment
FAR	Floor Area Ratio
IESNA	Illuminating Engineering Society of North America

[1] Pursuant to IMC 18.02.020, "Where terms are not defined, they shall have the commonly accepted meaning within the context with which they are used."

Acronym	Meaning
IMC	Issaquah Municipal Code
ISD	Issaquah School District #411, Applicant
LOS	Level of Service
MDNS	Mitigated Determination of Nonsignificance
MSE	Mechanically Stabilized Earth
MSP	Master Site Plan
MUTCD	Manual on Uniform Traffic Control Devices
PCB	Polychlorinated Biphenyl
PGIS	Pollution Generating Impervious Surface
PPUA	Providence Point Umbrella Association
RCW	Revised Code of Washington
REC	Recognized Environmental Condition
SDP	Site Development Permit
SEPA	State Environmental Policy Act
SF-SL	Single Family – Small Lot zoning district
SMC	Sammamish Municipal Code
SPW	Sammamish Plateau Water
TMP	Transportation Management Plan
UGB	Urban Growth Boundary
US	United States
WAC	Washington Administrative Code
WISAARD	Washington Inventory of Architectural and Archaeological Resources

IV. Background

A. Landmark Commission and Building Demolition

The site was formerly home to the historically significant Providence Heights College, established in 1961. In 2008, the property was purchased by the nondenominational Churchome (formerly City Church). In 2014, Brixton Homes, LLC began work to develop housing on the site (PRJ14-00012). In 2016, the Issaquah School District (ISD) School Board began eminent domain proceedings to acquire the site for a new high school and elementary school and later voted to condemn the property.

During condemnation, the Sammamish Heritage Society partnered with local and state historic preservation programs to file a landmark nomination to protect the site due to the College's historic integrity and architectural significance. The landmark designation was granted by the Issaquah Landmarks Commission in July 2017. In April 2018, the King County Superior Court held that the application of the Landmark Ordinance to Churchome was an unconstitutional violation of the church's First Amendment rights. The Court ruled that the landmark decision was vacated while Churchome owned the property and Churchome demolished the Providence Heights College buildings in June 2017, after resolution of litigation related to the demolition permit and underlying SEPA decision. The College's stained-glass windows were preserved and donated to the Sisters of Providence, the original owners. The Issaquah Landmarks Commission determined that the vacant land no longer possessed sufficient historic integrity to meet the requisite designation criteria and the site's landmark designation was formally terminated on July 27, 2019.

B. Compact Schools

In 2012, the King County School Siting Task Force established recommendations directing that new schools be limited to locations inside the Urban Growth Area boundary and directing Countywide policies committing jurisdictions to use zoning and other land use tools to ensure a sufficient supply of land for siting schools. The King County Council subsequently adopted the School Siting Task Force recommendations with amendments to the Countywide Planning Policies and King County Comprehensive Plan, and specifically adopted policies requiring school districts and cities to work together and use a variety of strategies to address school capacity needs, including by utilizing tools to reduce land use requirements. In response, City staff worked collaboratively with the Issaquah School District to develop regulations applicable to any new public school constructed within the City of Issaquah, including establishing dimensional standards, a review process, landscaping requirements, and approval criteria for school projects. The City of Issaquah adopted Ordinance No. 2806 in 2017 to amend IMC 18.07.480, Community Facilities Standards, and CIDDS Ch. 4, "Zoning Districts, Uses, and Standards" related to Compact Schools (formerly called Urban Schools) to adopt these standards. The compact schools regulations were amended in 2019 by Ordinance No. 2868 to provide additional standards for non-school public buildings and establish approval criteria for floor area ratio reductions and build-to line increases. These regulations apply to all areas of

the City of Issaquah in recognition of the limited parcels available to meet the needs of the growing Issaquah school population.

In understanding the City's development regulations for schools, it is important to note that the so-called "compact schools regulations" are the only regulations in the City's code that directly control development of new public school facilities. The compact schools regulations are within subsection 18.07.480 of the IMC and are not separately titled "compact schools" within the code. Portions of the regulations in IMC 18.07.480 reference specific requirements in the Central Issaquah Development and Design Standards (CIDDS) and these portions of the CIDDS apply where referenced.

C. Rezone, Nonproject SEPA, and Growth Management Hearings Board Appeal

On January 21, 2020, the Issaquah City Council adopted Ordinance no. 2895, which changed the Comprehensive Plan designation of the property from Low Density Residential to Community Facilities and rezoned the property from Single Family-Small Lot (SF-SL) to Community Facilities-Facilities (CF-F). The City of Issaquah issued a Determination of Nonsignificance (DNS) for the amendments as a non-project action on September 13, 2019, and a Final DNS on October 9, 2019 (Permit no. SEP19-00009). The Providence Point Umbrella Association (PPUA) appealed the Final DNS on October 22, 2019.

The City Council reviewed the proposed amendments and heard PPUA's SEPA appeal on December 2, 2019. The City Council denied the SEPA appeal on December 16, 2019. PPUA challenged the City Council's denial of the SEPA appeal and adoption of Ordinance no. 2895 at the Central Puget Sound Region Growth Management Hearings Board (case no. 20-3-0002) on February 13, 2020. The Growth Management Hearings Board issued its Final Decision and Order on October 13, 2020. The Board concluded that PPUA had not met their burden of proof and the case was dismissed. No further action was pursued by the PPUA.

V. Property, Vicinity, and Project Description

A. Property Description

The proposed development is a consolidated grade school campus on three parcels formerly developed as the Providence Heights College (collectively "the property" or "the site"). The property is located at 4221 228th Avenue SE (parcel nos. 1624069031, 1624069001, and 1624069029) and is approximately 40.79 acres (1,776,913 square feet) in size (Attachment 97, Sheets C0.2LU-C0.5LU – Site Survey). The site is currently vacant following demolition of the Providence Heights College buildings. A water tower and related improvements in the southwest portion of the property remain as the only buildings on the site; the Providence Heights Loop private road and other paved areas also remain.

The property has a central clearing with a heavily modified land surface that is surrounded by existing, mature forest with a shrub and groundcover understory. The clearing is an elevated relatively flat to gently sloping plateau and the surrounding topography generally slopes down from the central plateau toward the northeast, south, and southwest at inclinations less than 30 percent (Attachment 42 – Geotechnical Report). Slope inclinations are as steep as approximately 50 percent in several areas around the site (Attachment 42 – Geotechnical Report). Site vegetation is comprised predominantly of native species, with patches of Himalayan blackberry (Attachment 38 – Critical Area Study & Wetland Mitigation Plan). The forested areas include a network of informal trails, remnants of a ropes course, and other minor modifications. There are two small Category IV wetlands (Wetland B and Wetland C) on the site (Attachment 38 – Critical Area Study & Wetland Mitigation Plan) and an area of man-made steep slopes (Attachment 42 – Geotechnical Report). Site access is from two points along 228th Avenue NE: a primary driveway approximately 480 feet south of the 228th Avenue SE/SE 40th Street intersection and a secondary driveway to Providence Heights Loop at the southernmost end of the property. See Figure 2, below, for a current aerial image of the property (Attachment 90 – Existing Site Aerial).

B. Project Vicinity

The site is located in the Providence Point neighborhood at the north end of the City of Issaquah, adjacent to the City of Sammamish. The immediate vicinity is characterized by predominantly low-density residential development interspersed with moderate-density multifamily buildings. Farther to the north is a small commercial node and, beyond that, Pine Lake Middle School and Skyline High School in the City of Sammamish. To the south is Issaquah High School. The northern, western, and southern property lines are largely surrounded by the Providence Point retirement community – except for the eastern half of the northern property line, which abuts the Bellewood assisted living community. The eastern property line is adjoined by 228th Avenue SE and single-family neighborhoods in the City of Sammamish. The 228th Avenue NE right-of-way and roadway improvements are almost completely within Sammamish's city limits except at the southernmost portion of the project. Refer to Figure 1, Vicinity Map with Zoning Designations.

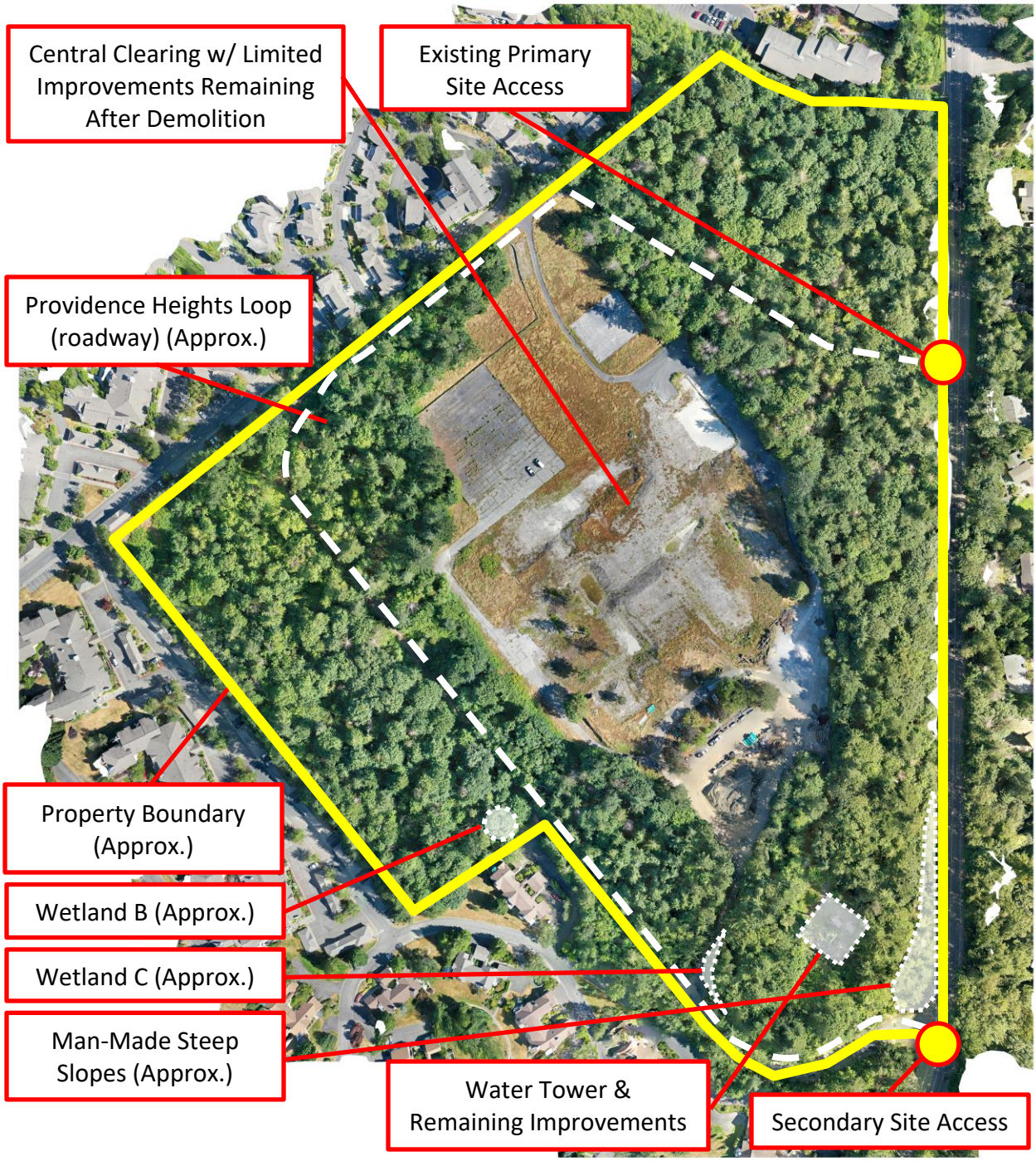


Figure 2: Aerial Image of Subject Property. Annotations by Staff. Source: ISD (Attachment 90 – Existing Site Aerial).

C. Project Description

Issaquah School District (ISD) is proposing to construct a combined elementary school and high school campus to address existing overcrowding and projected enrollment meet enrollment needs within the school district. The high school will serve an enrollment capacity of approximately 1,823 students with approximately 150 faculty and staff. The elementary school will serve an enrollment capacity of approximately 744 students with approximately 75 faculty and staff. At maximum enrollment, up to 2,792 people can be expected to be on site (see Table 1, right). **[CONDITION 1]**

Table 1: Total Site Capacity. Source: ISD (Attachment 60 – Transportation Technical Report).

Building	People
High School	
Students – Main Building	1,631
Students – Portables	192
Faculty & Staff	150
High School Subtotal	*1,973*
Elementary School	
Students – Main Building	552
Students – Portables	192
Faculty & Staff	75
Elementary School Subtotal	*819*
Total Students	2,567
Total Staff	225
Total People on Site	2,792

Refer to Figure 3, Project Site Plan with Annotations (next page), for a visual overview of key project components.

The high school will be located in the southerly portion of the property and will be constructed with 56 classrooms and a 500-seat auditorium (labeled ❶ on Figure 3). The site plan indicates a future 10-classroom building addition and four future two-classroom portables (total of eight classrooms in portables) (labeled 1a and 1b on Figure 3). The elementary school is proposed on the west side of the property and will be constructed with 24 classrooms and a 350-seat cafeteria/gymnasium space (labeled ❷ on Figure 3). The site plan indicates four future two-classroom portables (total of eight classrooms in portables) (labeled 2a on Figure 3). The schools are separated from one another by sports facilities and play areas, parking, and circulation infrastructure.

The project will also include a new 2,000 seat sports stadium with track and grandstands (labeled ❸ on Figure 3), baseball and softball fields with pedestrian plaza (labeled ❹ on Figure 3), four tennis courts, other outdoor sports facilities, outdoor learning spaces, a parking garage (labeled ❺ on Figure 3) and surface parking, utility upgrades, new motorized and nonmotorized circulation facilities, a bus parking loop for student pick up and drop off (labeled ❻ on Figure 3), retaining walls, and related improvements throughout the site. Project components are clustered toward the center of the site as much as possible, leaving a substantial vegetated buffer (labeled ❼ on Figure 3) between the campus and the surrounding properties.

Project Description continued on Page 21.

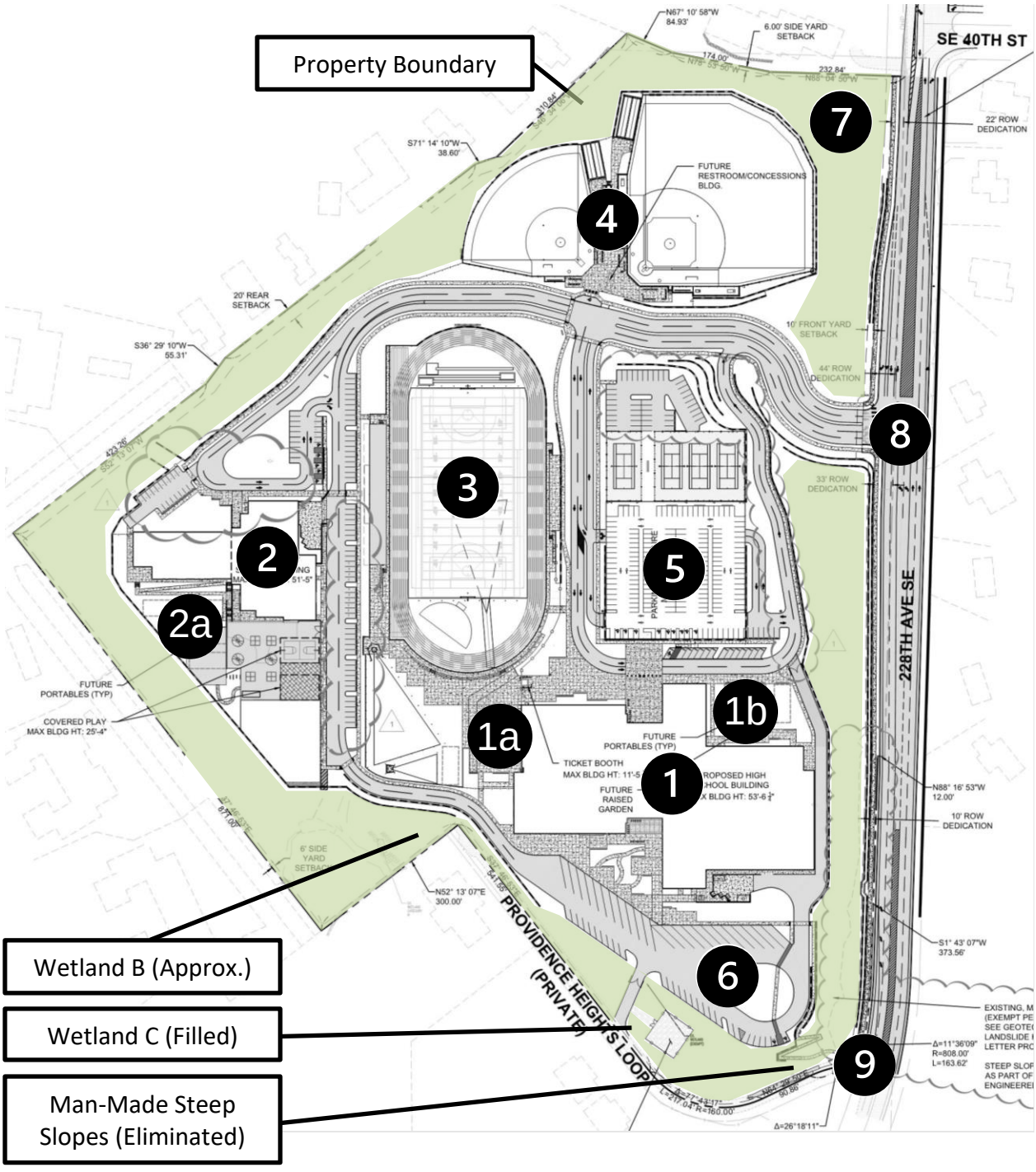


Figure 3: Project Site Plan. Annotations by Staff. Source: ISD (Attachment 97, Sheet C1.0LU – Civil Site Plan).

Figure 3 Key:

1	High School	2a	ES – Future Portables	6	Bus Pick Up, Drop Off, Parking Loop
1a	HS – Future Addition	3	Stadium & Track	7	Vegetated Buffer (Approx.)
1b	HS – Future Portables	4	Ball Fields & Plaza	8	Primary Access
2	Elementary School	5	Parking Garage	9	Emergency Access

ISD will perform selective tree removal within the buffer area to eliminate dead and dying trees, remove invasives from the understory, and replant trees, shrubs, and groundcover within the buffer to mitigate for tree removal on the site.

The project includes new frontage improvements extending from the 228th Avenue SE/SE 40th Street intersection north of the site to the SE 43rd Way/Providence Point Drive SE intersection south of the site. Frontage improvements will consist of a new signalized intersection for primary access (labeled ❽ on Figure 3) at the main entry to the campus, minor improvements to provide emergency-only access at Providence Heights Loop (labeled ❾ on Figure 3), road widening, and pedestrian and bicycle infrastructure. Most frontage improvements will occur within the City of Sammamish's right-of-way for 228th Avenue SE.

1. ADMINISTRATIVE ADJUSTMENTS REQUESTED BY APPLICANT

To construct the project as proposed, the Applicant is requesting five administrative adjustments of standards:

1. Reduce the Minimum Required Floor Area Ratio (Permit no. AAS20-00001). The Applicant is requesting to reduce the required floor area ratio from 0.75 to 0.42. The practical outcome of this reduction is less required building square footage on the property.
2. Reduce the Minimum Required Tree Retention (Permit no. AAS21-00001). The Applicant is requesting to reduce the minimum tree retention requirements to accommodate removal of dead and dying trees on the site.
3. Authorization for Shared Parking Facilities (Permit no. AAS21-00002). The Applicant is requesting authorization for sharing parking facilities between daytime school uses and after-school event uses. The practical outcome of shared parking is to reduce the number of on-site parking stalls provided.
4. Modification to Requirements for Continuous Nonmotorized Walkways (Permit no. AAS21-00005). In specific locations on the site, the Applicant is requesting modifications to requirements to provide nonmotorized pathways on both sides of the proposed internal access roadways. In these locations, nonmotorized pathways will be provided on one side of the proposed internal access roadway.
5. Modification to Requirements for Nonmotorized Public Street Frontage Connections (Permit no. AAS21-00006). The Applicant is requesting to reduce the total number of nonmotorized connections from the site to 228th Avenue SE.

The requested AASs are identified as options within the IMC and CIDDS for the respective topic areas. The requests for AASs will be discussed in detail in Section VII, below.

VI. Levels of Review

A. Land Use Permits Required and Consolidation of Review Processes

The project requires a Site Development Permit (SDP) and a Master Site Plan (MSP) approval. The project triggers a SDP due to its primary access and street frontage along 228th Avenue SE, per IMC 18.04.450(A)(2). An SDP requires a Level 3 review, which is typically decided by the Development Commission. The project also triggers a Master Site Plan due to its developable site area exceeding 15 acres per IMC 18.07.620. An MSP requires a Level 5 review decided by the City Council. The MSP, which is a conceptual plan for developing the site potentially in phases, then requires a more detailed land use plan review via an SDP. These two land use permits (MSP and SDP) can be reviewed serially or concurrently. The Applicant has submitted the MSP and SDP for concurrent review and has requested the optional Consolidated Permit Review Process set forth in IMC 18.04.160, allowing consolidation of certain processing and procedural requirements (see Sections VI.B-VI.D, below) and assigning final decision authority to the decision-maker of the highest level of review (IMC 18.04.220). The Level 5 process is the highest level of review, and the City Council is the highest level decision-maker.

The Applicant has also requested five Administrative Adjustments of Standards (AAS), which are typically Level 2 reviews decided by the Community Planning & Development (CPD) Director or Planning Manager pursuant to Table 18.04.100-1: Levels of Review.

Upon review of the AASs, the City determined that they meet the following criteria set forth in IMC 18.04.100(B) to merit a higher level of review:

1. *The proposal is in close proximity to and/or appears to present potential for significant impacts to a critical area or other prominent natural feature.*
   Staff Analysis: The proposal includes construction in close proximity to and within critical areas, including two Category IV wetlands, geologically hazardous areas, and a critical aquifer recharge area.

2. *The proposal is in close proximity to and/or appears to present potential for significant impacts to any public/quasi-public facility, historic site, or residential area.*
   Staff Analysis: The proposal is in close proximity to the Providence Point and Bellewood communities, two residential areas.

3. *The proposal represents a significant, though permitted, change in comparison to surrounding properties either by introduction of a different type of land use or by being more than twice the height and/or square footage of surrounding structures.*
   Staff Analysis: The proposal represents a significant change in comparison to surrounding properties by introducing a different type of land use. The proposal changes vacant property into a new consolidated high school and elementary school campus.

4. *The proposal appears to present characteristics not anticipated by the Comprehensive Plan and/or the Land Use Code and/or the Olde Town Design Standards.*
   Staff Analysis: The proposal is consistent with the Comprehensive Plan and does not meet this threshold.

5. *Community concern is documented that: involves potential environmental, land use, or transportation impacts not anticipated by the Comprehensive Plan and/or Land Use Code; is received in a timely manner; and is determined to warrant additional review.*
   Staff Analysis: The community has identified concerns related to potential environmental, land use, and transportation impacts. Comments were received during the Community Conference prior to submittal and during the land use review process (including the Environmental Neighborhood Meeting) and are timely.

The AASs can be elevated to a higher level of review based on just one of the foregoing criteria, and the proposal meets four of them. This is adequate to determine that the AASs merit a Level 5 review and are consolidated with the SDP and MSP for processing, public hearing and recommendation at the Development Commission, and decision by the City Council.

B. Roles, Authority, and Decision Criteria

The purpose of the SDP and MSP is to obtain planning-level approval from the decision-maker with the confidence that the project meets the standards and guidelines contained in the IMC, prior to the preparation of construction documents. The purpose of the AASs is to authorize limited departures from code requirements prior to the preparation of construction documents.

According to IMC 18.04.510, the Development Commission's role in a Level 5 review process is to make a recommendation and findings of fact on the proposal to be forwarded to the City Council for a decision. The Development Commission considers Staff's recommendation, which is developed based on a review of compliance with the Comprehensive Plan and provisions in the IMC. The City Council's role is to make decision on the consolidated permits based on the record created by the Development Commission.

1. SITE DEVELOPMENT PERMIT

Pursuant to IMC 18.04.430, the decision to approve, approve with conditions, or deny the SDP must be based on the staff report, applicable criteria, public comments, and discussion of the issues. Staff's analysis evaluates the proposal based on compliance with:

1. The Comprehensive Plan;
2. The standards and provisions of Title 18 IMC, and other uniform codes in effect and administered by the City and applicable jurisdictions; and
3. The criteria set forth in the Design Criteria Checklist (Chapter 18.07 IMC, Appendix 2).

Only those goals and standards that apply to the Site Development Permit application are discussed in the staff report.

2. MASTER SITE PLAN

Pursuant to IMC 18.04.510, the decision to approve, approve with conditions, or deny the MSP must be based on the staff report, applicable criteria, public comments, discussion of the issues, and recommendation of the Development Commission. Action must be based on the approval criteria set forth in IMC 18.07.660. Staff's analysis evaluates the proposal based on compliance with the following criteria:

1. Comprehensive Plan Consistency: The project is compatible with and permitted by the Issaquah Comprehensive Plan and any other applicable area plan adopted by the City;
2. Permitted Use Compatibility: The proposed project will be compatible with permitted land uses in the vicinity of the project site;
3. Site Plan Contents: The following areas are clearly identified and marked on the master site plan:
    a. Environmentally critical areas and any required buffer and/or setback area;
    b. Future development areas and the proposed land use in the form of a project development site plan;
    c. Areas of historical or cultural significance;
    d. Required buffer and setback areas (per this chapter), and required and proposed easements;
4. Density: Specific densities have been identified for each phase of the proposed development;
5. Streets and Sidewalks: Streets and sidewalks, existing and proposed, are suitable and adequate to carry anticipated traffic within the proposed project and in the vicinity of the proposed project, including sidewalks and other planning features that assure safe walking conditions for students who only walk to and from school; are adequately designed and delineated on the proposed project development site plan; and are to be completed by the completion date of the development;
6. Utility Services and Other Improvements: Utility services and other improvements, existing and proposed, are adequate for the development and are to be completed by the estimated completion date of the development as designated in Covenants, Conditions and Restrictions;
7. Phasing: Each phase of the proposed development, as it is planned to be completed, provides for the required parking spaces, streets and sidewalks, recreation facilities and park land, landscape and open spaces, critical area designations and buffers and utility service areas, and rights-of-way necessary for creating and sustaining a desirable and stable environment;

8. Subdivision: If a subdivision application is being processed concurrently with a master site plan, conformance with the requirements of Chapter 18.13 IMC shall be required;
9. Design Continuity: Design continuity is achieved through repetition of certain plant species and other landscape materials, certain building materials and other design concepts;
10. Accessory Structures: Accessory structures, including street furniture, mailboxes, kiosks and street lighting, will be designed to be part of the overall project design component and will provide uniformity and linkage through the site;
11. Nonmotorized Circulation: Linkages for safe circulation for pedestrians and bicycles shall be consistent with IMC 18.07.080, Nonmotorized facilities;
12. Public Access: Appropriate provisions are made for public access to any lakes, streams and scenic corridors within the site. The access provided must be environmentally sensitive in its design and implementation; and
13. Signage: The signage has consistent elements, such as color, shape, size, and graphics, which maintain consistency and uniformity throughout the project.

3. ADMINISTRATIVE ADJUSTMENT OF STANDARDS

Pursuant to IMC 18.04.390, Level 2 permits are decided in accordance with the purpose and intent of Chapter 18.04 using the approval criteria found in Chapter 18.07 IMC including, if applicable, development regulations, the Design Criteria Checklist, and other approval criteria.

Reduce the Minimum Required Floor Area Ratio (Permit no. AAS20-00001)
Pursuant to Table 18.07.480, Footnote 7, FAR reduction can be requested if needed for operational functions, subject to the approval criteria in IMC 18.07.480(E)(19). See Section VII.A.2 of this Staff Report for review criteria and analysis.

Reduce the Minimum Required Tree Retention (Permit no. AAS21-00001)
Pursuant to IMC 18.07.480(E)(14), the landscape standards in Chapter 10.0 of the Central Issaquah Development and Design Standards (CIDDS) apply to this project. CIDDS Section 10.13.B allows reduction of tree retention requirements subject to criteria 1-4 and/or 5 and criterion 6. See Section VII.A.14 of this Staff Report for review criteria and analysis.

Authorization for Shared Parking Facilities (Permit no. AAS21-00002)
Pursuant to IMC 18.09.060, an applicant may request an Administrative Adjustment to provide for flexibility in reducing or modifying parking standards. The approval criteria for an administrative adjustment of standards are set forth in IMC 18.09.060(D). Supplemental criteria for shared parking are set forth in IMC 18.09.060(E). See Section VII.A.12 of the staff report for review criteria and analysis.

Modification to Nonmotorized Facilities Continuous Walkways Requirement (Permit no. AAS21-00005)

Pursuant to IMC 18.07.080(C), an applicant may request an Administrative Adjustment to these standards as established in IMC 18.07.250 and reviewed by the criteria in IMC 18.07.350. See Section VII.A.13 of the staff report for review criteria and analysis.

Modification to Nonmotorized Facilities Public Street Frontage Connections Requirement (Permit no. AAS21-00006)

Pursuant to IMC 18.07.080(C), an applicant may request an Administrative Adjustment to these standards as established in IMC 18.07.250 and reviewed by the criteria in IMC 18.07.350. See Section VII.A.13 of the staff report for review criteria and analysis.

C. Procedures

The project requires a Level 3 Site Development Permit ("SDP") due to its location along 228th Avenue SE and a Level 5 Master Site Plan ("MSP") due to its size. As described in Section V.A, above, the Applicant requested the Consolidated Permit Review Process (IMC 18.04.160) and therefore the applications follow the Level 5 review process outlined in IMC 18.04.510. The Development Commission holds the public hearing and makes a recommendation on the project; the City Council makes a closed-record decision on the applications. The decision of the City Council is final unless appealed to King County Superior Court pursuant to IMC Table 18.04.250-2.

Level 5 review also requires that the Development Commission host an informal Community Conference **prior** to the public hearing to "generate discussion, raise issues, and propose creative options relative to the proposed project," per IMC 18.04.140. The Community Conference was held on July 15, 2020, and a summary of public comments received is included in Attachment 83.

Due to the presence of critical areas on the site, an Environmental Neighborhood Meeting is required per IMC 18.10.410(F) to discuss critical areas, potential project impacts, potential mitigation measures, and any protection or enhancement measures. The Environmental Neighborhood Meeting was held on April 28, 2021, and the materials are included in Attachments 84-87.

The Applicant and City Staff have collaborated extensively since the pre-application review to identify issues of compliance with the IMC and resolve these issues prior to the public hearing. The public has been given opportunities for early review and comment by providing the project documents on the City's website, from the time of the pre-application review.

Below is the project schedule following the Level 5 Review process. Some actions will occur in the future (e.g., Notice of Decision, and Appeals if one is filed).

Pre-application Meeting:	**August 1, 2019**
Community Conference:	**July 15, 2020**
Application Submittal:	**September 25, 2020**

Determination of Complete Application:	**October 6, 2020**
Environmental Neighborhood Meeting:	**April 28, 2021**
Development Commission Public Hearing:	**March 2, 2022**
City Council Review, Deliberation, and Decision:	**May 16, 2022** (tentative)
Notice of Action:	**May 20, 2022** (tentative)

D. Public Notices

The Notice of Application included required notices to: 1) parties of record, 2) adjacent property owners, 3) the City's website, and 4) property posting.

Notice of Application:	**October 20, 2020**
Notice of Application (AAS Applications):	**June 16, 2021**
Notice of SEPA Threshold Determination:	**August 5, 2021** (by ISD)
Notice of Public Hearing:	**February 16, 2022**
Notice of Decision (Notice of Action):	**May 20, 2022** (tentative)

E. SEPA Review

The Issaquah School District is the Lead Agency for environmental review of the project under the State Environmental Policy Act (SEPA) pursuant to WAC 197-11-926, which states that when an agency initiates a proposal, it is the lead agency for that proposal. The City of Issaquah is an agency with jurisdiction because the project will occur within city limits and the City will issue permits for the project. ISD follows its adopted SEPA policies and procedures in performing its environmental review.[2]

ISD issued a Mitigated Determination of Nonsignificance (MDNS) pursuant to WAC 197-11-350 on August 5, 2021. ISD withdrew and re-issued an MDNS on December 9, 2021 and took comments on the MDNS through December 23, 2021. ISD issued a Final MDNS on January 17, 2022 (Attachment 74). According to ISD, the proposal will have no probable significant adverse environmental impact when mitigation measures specified in the MDNS are incorporated into the project. Measures identified by ISD as necessary to mitigate potential environmental impacts are considered as part of the project design and are listed in Attachment 74 to this Staff Report. Mitigation conditions from the SEPA MDNS are incorporated as conditions of approval of the subject land use permits. **[CONDITION 2]**

ISD's SEPA policies and procedures which do not provide for administrative appeals of determinations pursuant to WAC 197-11-680(3). ISD issued a final determination for this project on January 17, 2022 (Attachment 74). Any appeals of the MDNS, if filed, will be in the King County Superior Court and, by law, are to be filed only after the City makes a decision on the SDP and MSP as part of any appeal of the City permits. If a SEPA appeal is prematurely filed in King County Superior Court prior to the time the City completes its SDP and MSP review, the City's review of the SDP and MSP (and AASs) can continue unaffected by the SEPA Appeal. If

[2] Issaquah School District State Environmental Policy Act Compliance: https://www.issaquah.wednet.edu/district/regulations/6890

the City's final decision on these applications is appealed to the King County Superior Court, the SEPA appeal will be considered by the Court at the same time as the appeal on the applications.

VII. Review of Development Standards and Regulations

The proposal must demonstrate general conformance to applicable land use and development standards. The following sections describe and analyze the project proposal, identify compliance, and (where appropriate) provide the basis for the recommended Land Use Conditions. See Appendix A for a summary of code compliance by topic.

The Site Development Permit (SDP) and Master Site Plan (MSP) are higher-level land use permits that are prepared prior to construction-level permits for projects meeting certain thresholds to ensure that the projects comply at a land use level with City codes. Staff's review at the land use permit level is conceptual and based on *general conformance* to applicable development standards. Some elements, such as landscaping, lighting, and outdoor amenities, will be more fully reviewed with construction permits, and all elements will require subsequent construction-level review. The approval of the SDP and MSP, with or without conditions of approval, does not preclude Staff from requiring changes during construction permit review to ensure compliance with applicable standards.

Staff assumes all wet and dry utility vaults, meters, equipment, and similar appurtenances are identified on the drawings to fully understand their location and relative height. Identifying these elements during land use review is important in understanding project design and potential impacts. Changes to or additions of vaults, meters, equipment, and similar appurtenances after land use approval will require review and approval by the Director of Community Planning and Development or her designee (hereafter "Director"). **[CONDITION 3]** Changes to buildings, landscape, pedestrian facilities, roads, and other elements will likewise require permit modification; depending on the extent of modifications, any such changes may require a minor amendment approved by the Director **[CONDITION 4]** or a major amendment processed pursuant to IMC 18.04.450.

As with any application, especially one of this size and complexity, there are some inconsistencies, conflicts, and incomplete information. Any inconsistencies, conflicts, or incomplete information, other than those addressed directly by these permits' Notice of Decision, will be resolved by the Director or his designee, utilizing the Staff Report and in consultation with the Applicant, at the time of the future application. Furthermore, this proposal contains some detailed construction-level information that is typically reviewed with construction permits. These details were reviewed at a more schematic level appropriate for a land use permit. Additional review of construction-level information will take place with later construction permit submittals. **[CONDITION 5]**

EXPLANATORY NOTE:
Given the level of information provided for the SDP, MSP, and AAS applications analyzed in this Staff Report, please note that **any elements of the project proposal that conflict with City code or standards are not approved unless explicitly identified by the Notice of Decision for these applications** or by a separate AAS.

EXPLANATORY NOTE:

This is a complex project with many code requirements and, by extension, a lengthy Staff Report. The Staff Report structure analyzes the project for conformance with applicable development standards in Section VII and summarizes findings and conclusions from that analysis into the decision criteria in Section VIII.

This (Section VII) code analysis section addresses applicable code requirements and development standards as follows:

A. **Zoning District, Uses, and Standards Summary.** This section analyzes the proposal against the zoning requirements in IMC 18.07.480 *Community Facilities (Public Schools) Standards*. The AASs are addressed in this section as they apply to specific requirements:
   a. AAS20-00012 FAR Modification—see Subsection A.2.
   b. AAS21-00005 Continuous Walkways Modification—see Subsection A.4.
   c. AAS21-00006 Pedestrian Connections Modification—see Subsection A.4.
   d. AAS21-00002 Parking Modification—see Subsection A.12.
   e. AAS21-00001 Tree Retention Modification—see Subsection A.14.

B. **Environmentally Critical Areas.** This section analyzes the proposal against development requirements for critical areas on the site in IMC Ch. 18.10, *Environmental Protection*. The following critical areas are discussed:
   a. Geologically Hazardous Areas
   b. Wetlands and Streams
   c. Critical Aquifer Recharge Area

C. **Other Title 18 Requirements.** This section addresses development requirements for accessory structures in IMC 18.07.110, outdoor lighting requirements in IMC 18.07.107, and noise control requirements in IMC 18.07.136.

D. **Design Criteria Checklist.** This section reviews the proposal against applicable design guidelines in the Design Criteria Checklist (IMC Ch. 18.07, Appendix 2).

E. **Clearing, Grading, and Stormwater Management.** This section addresses requirements for clearing and grading and discusses the stormwater management requirements in IMC Ch. 16.26.

F. **Vehicular Circulation Facilities and Traffic.** This section discusses the internal circulation network and the required right-of-way improvements in 228th Avenue SE and SE 43rd Way.

G. **Other Reviews.** This section addresses site contamination.

The heading hierarchy for the following sections is:

A. Major Topic Header; a broad review category

1. Minor Header; typically a specific code section

a. Specific Subtopic Header; typically a specific code subsection or AAS

Explanatory Header for Subtopics; typically breaks up a complex topic, a multipart requirement, or discusses a specific portion of the proposal

In particularly long sections of the report, a Section Summary box is provided at the beginning of the section.

A. Zoning District, Uses, and Standards Summary

Applicable zoning standards address permissible uses, building placement, building massing, and similar requirements. According to the City of Issaquah's official Zoning Map, the subject property is zoned Community Facilities-Facilities (CF-F) and is surrounded by residential properties zoned Multifamily – High (MF-H, 29 dwelling units per acre) and Single Family-Small Lot (SF-SL, 7.26 dwelling units per acre), shown in Figure 4, below.

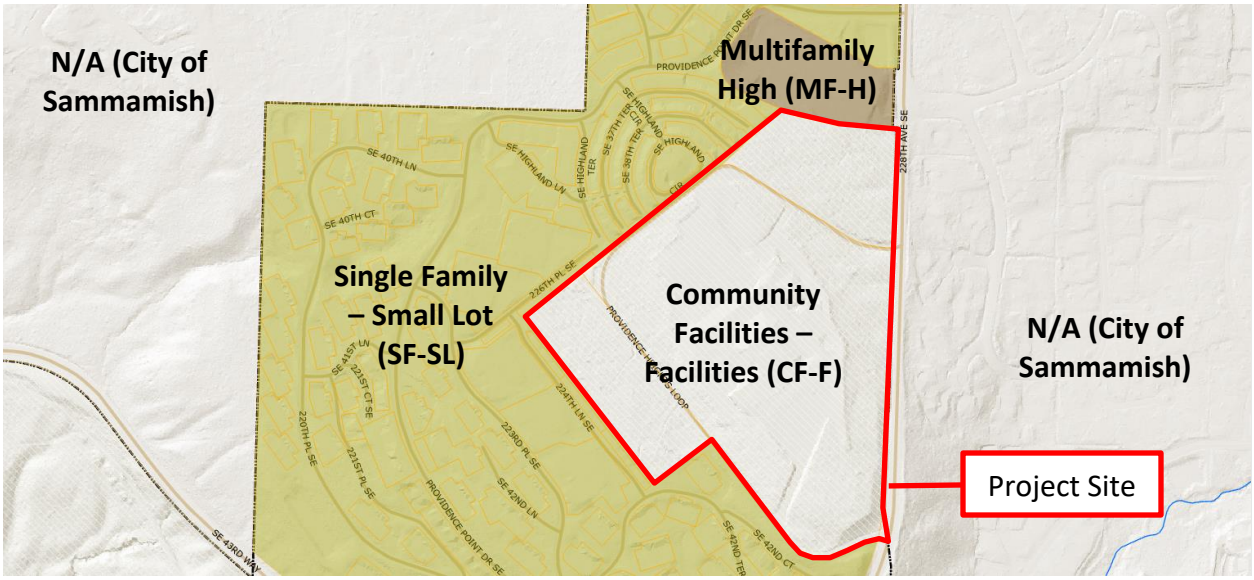


Figure 4: Excerpt of City of Issaquah Official Zoning Map with Labels and Annotations.

According to IMC 18.06.090, the intent of the community facilities zones is to provide for public benefit uses on publicly owned properties because public lands are a limited resource. The CF-F zone is primarily for services serving the larger community and includes uses that generate high levels of traffic. More specifically, the intent of the CF-F zone is to provide a land use designation for community facilities that do not qualify for open space or recreation (CF-OS or CF-R) land use designations.

Public school community facilities are subject to the approval criteria in IMC 18.07.480(E)(1) through (18).[3] The following section evaluates compliance with the approval criteria, including other standards in Title 18 IMC where they are referenced by the approval criteria and including requested administrative adjustments of standards (AASs).

1. ***IMC 18.07.480(E)(1): ARCHITECTURAL FORM AND CHARACTER***
   Pursuant to IMC 18.07.480(E)(1), the buildings must meet all applicable design requirements of the subarea in which they are located and shall (a) be efficiently sited

[3] IMC 18.07.480(E)(19) and (20) are approval criteria for modifications to specific development standards. They apply only if the modification is requested by the Applicant.

to use the smallest possible footprint; (b) regardless of whether the building is in Central Issaquah or not, the building shall comply with CIDDS Chapter 11.2.G *Views of Vistas*; and (c) shall meet the applicable sections of the Design Criteria Checklist (Appendix 2 of IMC Ch. 18.07).

a. IMC 18.07.480(E)(1): Subarea Design Requirements

The subject property is in the Providence Point neighborhood subarea according to the City of Issaquah's Comprehensive Plan. The Providence Point neighborhood does not have any adopted design requirements. This portion of the criterion (IMC 18.07.480(E)(1)) is not applicable.

b. IMC 18.07.480(E)(1)(a): Efficient Building Siting

According to the Applicant, building siting "takes advantage of the large clearing at the top of the campus, preserves as many trees and natural features as possible around the site perimeter and provides ample vehicular queueing to both schools," and "both schools are three story in height to minimize their footprint and site impacts" (Attachment 3 – Project Narrative).

Upon review of the site plan, it is apparent that the schools are located at the edges of the existing clearing and are designed to traverse the topography in these areas. The buildings buffer most vehicular traffic from the surrounding residential neighbors and the proposed location is appropriate from this perspective. The buildings are also designed to meet the maximum building height allowed on the property; the buildings cannot accommodate any additional stories within the maximum allowable height and a smaller footprint is not possible while accommodating all programmatic elements for the schools. The project complies with the requirement to efficiently site the buildings to use the smallest possible footprint.

c. IMC 18.07.480(E)(1)(b): Views of Vistas

According to CIDDS 11.2.G, developments are required to preserve views of forested hillsides of Tiger, Squak, and Cougar Mountains, the Sammamish Plateau, and Mount Rainier from public spaces. CIDDS 11.2.G.1 requires preservation of existing linear views along existing circulation facilities; no existing circulation facilities will be re-aligned and therefore any existing linear views will be preserved. CIDDS 11.2.G.2-3 requires the consideration of the above-mentioned forested hillsides as a criterion in determining appropriate layout of new circulation facilities and significant community spaces. The project includes new internal access roads meeting the definition of circulation facilities and components meeting the definition of community spaces (recreation amenities and resource protection) and the Applicant was required to consider the forested hillsides previously listed. The Applicant noted that "while there are scenic views of treed hillsides, no views of any nearby mountains are available" on the project site (Attachment 3 – Project Narrative). The project is designed to provide views of natural elements where

possible "to allow users to experience the natural environment as part of their site experience," such as nature overlooks accessible to pedestrians (Attachments 3 and 95 – Project Narrative, View Vista Diagram). The project complies with the requirement to preserve views.

d. IMC 18.07.480(E)(1)(c): Design Criteria Checklist

The proposal is subject to and complies with all sections of the Design Criteria Checklist. See Section VII.D of this Staff Report for a detailed review of compliance with the Design Criteria Checklist. The project complies.

IMC 18.07.480(E)(1) CONCLUSION: The project complies with architectural form and character requirements.

2. IMC 18.07.480(E)(2): DEVELOPMENT (DIMENSIONAL) STANDARDS

SECTION SUMMARY:

The proposal meets applicable requirements for building height, setbacks, build-to line, and impervious surface coverage. The proposal requires an AAS for the applicable FAR requirements and has demonstrated compliance with applicable FAR AAS approval criteria. See Table 2, below.

Pursuant to IMC 18.07.480(E)(2)(a), sites used for public schools, including high schools and elementary schools, must conform to the development standards in Table 18.07.480 *Community Facilities Standards for Public Schools and Public Buildings.* Applicable requirements are summarized in Table 2, below, and discussed in detail in the following section.

Table 2: Excerpt of Community Facilities Standards for Public Schools and Public Buildings. Source: Table 18.07.480 IMC.

	Floor Area Ratio (FAR)		Height	Setbacks		Build-To-Line	Impervious Surface
	Min	Max	Max	Side	Rear		Max
Required	0.75	2.0	65'	7'	7'	0' – 20'	90%
Proposed	0.42		63.15'	Min. 14.67'		Min. 16.83'	51%
Compliance	YES, with AAS		YES	YES		YES	YES

a. Floor Area Ratio

Floor area ratio (FAR) describes the relationship between the amount of gross floor area of buildings and the developable site area where the buildings are located. FAR is calculated by dividing the gross floor area of the buildings by the developable site area, as shown in the equation below:

$$\text{Floor Area Ratio} = \frac{\text{Gross Floor Area of Buildings}}{\text{Developable Site Area}}$$

A higher FAR equates to more building area on the site; a lower FAR equates to less building area on the site. Pursuant to Table 18.07.480, the project is required to have a minimum FAR of 0.75.

Table 3: Proposed Gross Floor Area. Source: ISD (Attachments 97, 98, and 22 – Civil Plans, Architectural Plans ["Building Elevations"], FAR AAS Narrative).

Building	**Gross Floor Area (Square Feet)**
High School	
Main Building	226,552
Future Addition	13,553
Future Portables	9,089.5
Pedestrian Walkway	4,205
Elementary School	
Main Building	71,283
Future Portables	9,089.5
Covered Play Area	5,884
Canopy and Shelter Area	2,098
Loading Dock	643
Stadium	
Ticket Booth	278
Grandstand	9,137
Total	**351,812**

The gross floor area of the buildings is determined pursuant to the definition of "floor area, gross" set forth in IMC 18.02.080.[4] The high school building, elementary school building, all portables, portions of the elementary school playground and outdoor learning areas, the elementary school loading dock, and the stadium ticket booth and grandstand meet the definition of "building" and are counted toward the total gross floor area, as shown in Table 3, on previous page. The Applicant indicated the gross floor area of all buildings is 351,812 square feet (Attachment 97 – Civil Plans, Attachment 98 – Building Elevations [floorplans], Attachment 22 – FAR Narrative).

The developable site area is determined pursuant to the definition of "site area, developable" set forth in IMC 18.02.210.[5] The gross site area is 1,776,913 square feet (Attachment 97, Sheets C0.2LU-C0.5LU – Site Survey). To calculate the developable site area, the Applicant is allowed to deduct critical areas and their buffers, and any significant public plazas or significant public parks as shown on Figure 7B of the CIDDS.[6] Wetland B has an area of approximately 280 square feet and is a Category IV wetland with no buffer (see Section VII.B.2, below). Wetland C is proposed to be filled during development (see Section VII.B.2, below) and the area cannot be deducted. The project is located outside of Central Issaquah and Figure 7B of the CIDDS does not identify any significant public plazas or significant public parks on the property. The developable site area is therefore 1,776,663 square feet as shown in Table 4, on the following page.

Footnote 8[7] of Table 18.07.480 indicates that, for public buildings (including schools per the noted standard in the Table), community space is not counted in the FAR calculation. "Community space" is defined in IMC 18.02.050[8] and the Applicant has included community spaces in the project proposal (Attachment 22 – FAR Narrative). Community spaces proposed by the Applicant include community use of the

---

[4] Pursuant to IMC 18.02.080, **Floor area, gross** means "The sum of the total horizontal areas of the several floors of all buildings on a lot, measured from the interior faces of exterior walls. The term "gross floor area" includes basements, elevator shafts and stairwells at each story; floor space used for mechanical equipment with structural head room; interior balconies; and mezzanines. Gross floor area shall not include outside balconies that do not exceed a projection of six (6) feet beyond the exterior walls of the building. Parking structures below grade and rooftop mechanical structures are excluded from gross floor area…."

[5] Pursuant to IMC 18.02.210, **Site area, developable** means "The gross site area minus deductions for critical areas and associated buffers as required by Chapter 18.10 IMC, Environmental Protection, and minus dedications for significant public plazas and significant public parks as shown on Figure 7B, Central Issaquah Development and Design Standards."

[6] Figure 7B is located in CIDDS Chapter 7.0 *Community Space*. Figure 7B applies only within Central Issaquah and there are no significant public plazas or significant public parks on the project site.

[7] Table 18.07.480, Footnote 8 states: For public buildings, community space is not counted in the FAR calculation.

[8] Pursuant to IMC 18.02.050, **Community space** means "Public lands containing resource protection, recreation or public amenity such as parks, plazas, trails, informal gathering areas, community gardens, and other similar facilities and areas…."

following sports facilities in accordance with preexisting agreements with the City of Issaquah Department of Parks and Community Services: tennis courts and plaza, track and field, ball fields and plaza, elementary school playground, and other outdoor plazas (Attachment 22 – FAR Narrative). **[CONDITION 6]** The Applicant is also proposing resource protection areas as community space by preserving and enhancing approximately 8.9 acres of existing, mature vegetation around the perimeter of the property. This approach to resource protection is supported by City goals to protect urban forests[9] and public comment strongly in favor of tree protection, especially at the perimeter of the property between the proposed facilities and the adjacent residential buildings and along the 228th Avenue SE right-of-way. This approach is also supported by standard practice in urban resource conservation and watershed protection, which prioritize the preservation of large and contiguous areas of native vegetation. Preservation of the existing, mature vegetation provides many functional values, including habitat refuge for small animals (e.g., birds, squirrels), facilitates natural precipitation infiltration that supports groundwater recharge and streams in the drainage basin, and reduces urban heat island effect through shading, all of which are especially important in an urban landscape. **[CONDITION 7]** The developable site area is, therefore, shown in Table 4, below.

Table 4: Developable Site Area and Community Space Calculations. Source: ISD (Civil Plans, FAR Narrative).

Site Feature	**Area (Square Feet)**
Gross Site Area	1,776,913
Critical Areas and Buffers (Wetland B)	280
Significant Public Plazas/Significant Public Parks	0 (N/A)
Community Space – Public Amenities	550,810
Community Space – Resource Protection	389,673
Developable Site Area	**836,150**[10]

Using the gross floor area and developable site areas described above, the FAR is calculated as:

$$\text{Floor Area Ratio} = \frac{\text{Gross Floor Area of Buildings}}{\text{Developable Site Area}} = \frac{351{,}812}{836{,}150} = \mathbf{0.42}$$

[9] The 2018 Park Strategic Plan Goal E is to "Preserve, enhance and protect a coordinated system of parks and public open spaces to preserve the city's natural character, **sustain its urban forest resources** and enhance its natural systems, wildlife habitat and wildlife corridors as a legacy for future generations." Emphasis added.

[10] This value differs slightly from the information presented in Attachment 22 – FAR AAS Narrative. The Applicant's calculations use a gross site area of 1,776,812, which is smaller than the gross site area shown on the survey. The survey is presumed by Staff to include the most accurate information. In either case, the FAR is calculated to 0.42 and the difference does not result in a material change to the requested AAS.

b. AAS20-00012, IMC 18.07.480(E)(2), FAR Reduction

The Applicant submitted a request to reduce the minimum required FAR from 0.75 to 0.42 consistent with Footnote 7[11] of Table 18.07.480 **(Permit no. AAS20-00012)**, which authorizes reductions to the FAR to accommodate operational functions[12] using the AAS process established in IMC 18.07.250[13] and the approval criteria in IMC 18.07.480(E)(19). The Applicant has indicated the reduction is necessary to accommodate operational functions including easements and right-of-way dedications, private access roads, parent drop off areas, bus pickup and drop off areas, staff parking, ADA-accessible walkways, and buffers and landscape screening (Attachment 22 – FAR Narrative). The Applicant has eliminated planned operational functions that are typically provided at District high schools (specifically, practice fields, two additional tennis courts, outdoor learning spaces, and gathering plazas) at the high school to accommodate the elementary school, which adds building square footage to the site, but is still unable to achieve the minimum FAR of 0.75. According to the Applicant, the operational functions cannot be further reduced without compromising the educational purposes for these school facilities.

The project includes primary buildings for the high school and elementary school and a number of accessory structures that are typical of high school and elementary school campuses, many of which do not meet the definition to be considered a "building" under the IMC, but which are necessary for a comprehensive grade school education. Examples include sports fields, playgrounds, outdoor learning areas, plazas, and similar operational functions. The FAR reduction is therefore necessary for operational functions.

The Applicant provided a narrative addressing the approval criteria in IMC 18.07.480(E)(19):

a. *The reduction is the least amount necessary for incorporation of operational functions and/or academic curriculum.*
   Staff Analysis: The Applicant has provided a detailed calculation of the FAR, showing all buildings, community spaces, and deductible site features. The Applicant has maximized the use of shared infrastructure such as circulation facilities, parking, and utilities to serve both schools. The Applicant has

[11] Table 18.07.480, Footnote 7 states: "FAR reduction may be requested, if needed, for operational functions at the discretion of the Designated Official, using the administrative adjustment of standards process established in IMC 18.07.250, Administrative adjustment of standards. Approval criteria for FAR reduction is established in subsection (E)(19) of this section. For schools, operational functions include outdoor space that is used for required academic curriculum; for example: track and field areas."

[12] ISD is solely responsible for determining operational functions pursuant to the Office of the Superintendent of Public Instruction (OSPI) and requirements in WAC 392-342-015. ISD determines the educational requirements for each school and the facilities, grounds, and spaces needed to accommodate program requirements.

[13] The AAS was consolidated with the SDP and MSP for processing requirements pursuant to IMC 18.04.160. See Section VI.A of this Staff Report for additional information.

eliminated and/or reduced certain programmatic elements such as practice fields, tennis courts, playgrounds, and outdoor learning spaces and gathering plazas. The requested reduction in FAR is the minimum necessary to incorporate the remaining operational functions and academic curriculum spaces. The requested FAR AAS complies with this criterion.

b. *The reduction is no greater than fifty (50) percent of the minimum FAR listed in Table 18.07.480, Community Facilities Standards for Public Schools and Public Buildings.*
Staff Analysis: The proposed reduction is approximately 44 percent of the minimum FAR listed in Table 18.07.480 and the request complies with this criterion.

c. *The reduction will be equal to, or superior in, fulfilling subsection A of [Section 18.07.480 IMC], Purpose and Intent.*
Staff Analysis: IMC 18.07.480(A) establishes the purpose and intent of the community facilities standards:

1. *Compatibility of Land Uses: Establish general standards regarding aesthetics, height, and other development standards for community facilities which will ensure compatibility of design, construction and scale, and minimize the impact of these facilities with surrounding uses.*
Additional Staff Analysis: The project is designed to comply with applicable height, setback, build-to-line, and impervious surface requirements and with the aesthetics contained in the Design Criteria Checklist that provides general standards and guidelines for building and site design aesthetics. The Applicant has also incorporated mitigation measures to minimize the impact of the project on surrounding uses, including retaining and enhancing existing, mature vegetation around the perimeter of the property, using structures to reduce site grading, enclosing mechanical equipment within buildings and placing waste bins (dumpsters) in enclosures, and similar features. Right-of-way improvements will reduce potential traffic impacts on the surrounding community. To ensure future compatibility with the adjacent property, an easement to protect, maintain, and enhance the vegetated buffer is recommended. As conditioned, the proposal is consistent with the purpose and intent of the *Compatibility of Land Uses* statement and the requested FAR AAS complies with this criterion.

2. *Provision of Service: Establish general standards to ensure that the public is provided with safe and functional community facilities.*
Additional Staff Analysis: The project is designed to provide a safe and functional community facility. The project has been designed to be self-contained, with a combination of fencing and retaining walls around the school facilities to enhance security. Site access is through a single primary entrance, with a secondary emergency entrance for vehicles and a secondary

ADA-accessible pedestrian pathway available for ingress and egress. The project includes features to mitigate potential noise, lighting, and traffic impacts, including accommodating circulation and queueing on site. Right-of-way improvements will reduce potential traffic impacts on the surrounding community. Noise will be mitigated by sound attenuation features. Lighting is designed with full cut-off fixtures to prevent spillover onto neighboring properties. The proposal is consistent with the purpose and intent of the *Provision of Service* statement and the requested FAR AAS complies with this criterion.

3. *Comprehensive Plan Implementation: Provide for community facility improvements and additions necessary to meet local and regional needs and implement Issaquah's Comprehensive Plan.*
   Additional Staff Analysis: The project is consistent with the City of Issaquah's Comprehensive Plan. The Applicant provided a Comprehensive Plan Narrative (Attachment 8) describing how the proposal is consistent with and supports goals in the Land Use and Transportation Elements, including Land Use Goal H, which states "Allow for and accommodate growth in a manner that is fiscally responsible to the community and enhances and protects the natural environment." Significant population growth within the region must be served by adequate public facilities, including public schools, and this project will provide an essential public service. The proposal is consistent with the purpose and intent of the *Comprehensive Plan Implementation* statement and the requested FAR AAS complies with this criterion.

4. *Compact Facilities: Allow for the siting of public buildings more efficiently as the City continues to densify.*
   Additional Staff Analysis: The proposal provides two public schools on a site with a size more typical of a single high school campus. The proposal maximizes shared circulation, parking, and utility facilities. Buildings are clearly designed much more compactly than conventional buildings (see Figure 5 on the following page). The Applicant has also eliminated some programmatic elements to use the property more efficiently. A lower FAR is necessary because many accessory structures and facilities associated with a high school and elementary school, especially sports facilities necessary for physical education and outdoor play, do not meet the definition of a "building" and cannot be counted toward gross floor area.

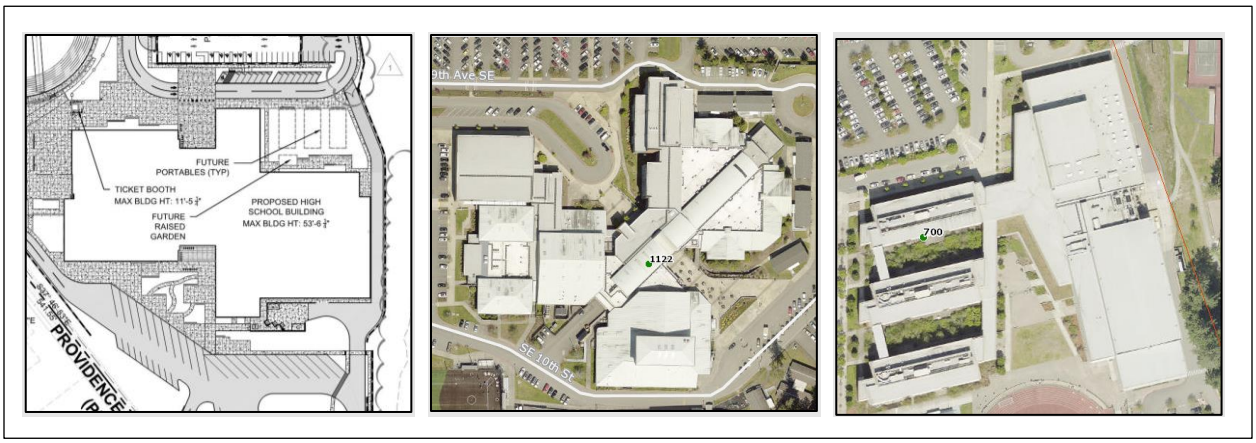


Figure 5: Comparison of Footprints: Proposed High School No. 4 (left), Skyline High School (center), and Issaquah High School (right). Source: ISD (Attachment 97, Sheet C1.0LU – Civil Site Plan), King County iMap. Not to scale.

ISD performed a thorough property search in determining an appropriate site for construction of new facilities. The search identified very few properties in the school district's boundaries, and this was the only site that was adequately sized with a sufficient buildable area for a new high school (Attachment 22 – FAR Narrative). The Applicant made efficient use of the property to provide two school facilities on a single site. The FAR AAS request complies with this criterion.

CONCLUSION: Based on the foregoing analysis, Staff concludes that the project will be equal to or superior in fulfilling the purpose and intent of the community facilities standards set forth in IMC 18.07.480(A). The proposal complies with this criterion.

AAS20-00012, IMC 18.07.480(E)(2), FAR Reduction: COMPLIES. The Applicant has demonstrated the request to reduce the FAR from 0.75 to 0.42 per Footnote 7 of Table 18.07.480 **(Permit no. AAS20-00012)** is necessary for operational functions and has demonstrated that the request is consistent with approval criteria in IMC 18.07.480(19).

CONCLUSION: Upon approval of the AAS request, the proposal will comply with minimum FAR requirements.

c. Height

Buildings and structures on the property are limited to no greater than 65 feet in height pursuant to Table 18.07.480. Building height is measured from the average

grade[14] of the existing or finished grade, whichever is lower, to the highest point of the coping of a flat roof pursuant to IMC 18.02.040[15] and IMC 18.07.060. The Applicant provided an average grade diagram for the high school building, elementary school building, elementary school covered play area, and parking garage (Attachment 98 – Building Elevations). Allowed and proposed building height information is shown in Table 5, below. The high school and elementary school buildings comply with maximum building height requirements.

Table 5: Summary of Proposed Building and Structure Heights

Structure	**Average Grade Elevation** (feet)	**Allowed Building Height** (feet)	**Coping Elevation** (feet)	**Proposed Building Height** (feet)
High School Building	509.89	574.89	563.50	53.61
Elementary School Building	485.12	550.12	548.27	63.15
Elementary School Covered Play Area	484.06	549.06	509.66	25.60
Parking Garage	491.07	556.07	518.71	27.64
Stadium Grandstands	*Not Provided*	65	*Not Provided*	34.33
Stadium Scoreboard	*Not Provided*	65	*Not Provided*	27.67

Pursuant to IMC 18.07.060(B)(4), the proposed screening for rooftop HVAC equipment on the elementary school is not subject to height limitations. No such appurtenances exceed the maximum height requirement on the high school.

Structure height information was provided for the stadium grandstands and scoreboard (Attachment 98 – Building Elevations); these structures are substantially lower than the maximum allowable building height and grade information is not required for this land use permit. Specific height information will be verified with the construction permit for each structure.

CONCLUSION: The proposal complies with applicable height requirements.

[14] Per IMC 18.02.090, **Grade, average** means: "The average elevation of the surface of the ground or paving where it touches the building."

[15] Per IMC 18.02.040, **Building height, Nonshoreline areas** means: "Building or structure height shall be measured from the average grade of the existing or finished grade, whichever is lower, to the…highest point of the coping of a flat roof. … No portion of a shed roof shall extend above the base building height limit. An architectural feature may not be used to measure or establish building height."

d. Setbacks

Table 18.07.480 establishes minimum setbacks of seven (7) feet from rear and side property lines and does not establish a front property line setback. These minimum setbacks are modified by Footnotes 2, 4, and 5 to the Table.

Footnote 2 of Table 18.07.480 indicates setbacks for critical areas are established in Chapter 18.10 IMC.[16] No buffers or setbacks apply to Wetland B, a Category IV wetland that is less than 2,500 square feet in size per IMC 18.10.640(C). Critical areas are addressed in Section VII.B of this Staff Report.

Footnote 4[17] allows reduction of the setbacks to zero (0) feet when the adjacent property is under common ownership, but does not allow a building to be built across the property line. The Applicant is proposing to construct buildings and structures across property lines and is required to submit and record a Boundary Line Adjustment to remove the interior lot lines. **[CONDITION 8]**

Because the Providence Point community is in a single-family zoning district, Footnote 5[18] modifies setbacks on adjoining property lines to be six feet from side property lines and 20 feet from rear property lines, matching the residential zone.[19] The subject property is irregularly shaped, and the property lines with setbacks are identified in Figure 6, below. There are no modifications to setbacks where the property adjoins multifamily zoning in the northeast portion of the property (the Bellewood property line).

[16] Table 18.07.480, Footnote 2 states: Setbacks for critical areas are established in Chapter 18.10 IMC, Environmental Protection.
[17] Table 18.07.480, Footnote 4 states: The side and rear yard setbacks may be reduced to zero (0) feet when the property directly abutting the affected side and/or rear yard is under common ownership….
[18] Table 18.07.480, Footnote 5 states: If the adjacent use is single family, then the side and/or rear yard setback is the same as the contiguous zoning.
[19] Providence Point is zoned SF-SL (see Figure 6 on page 43 of this Staff Report).

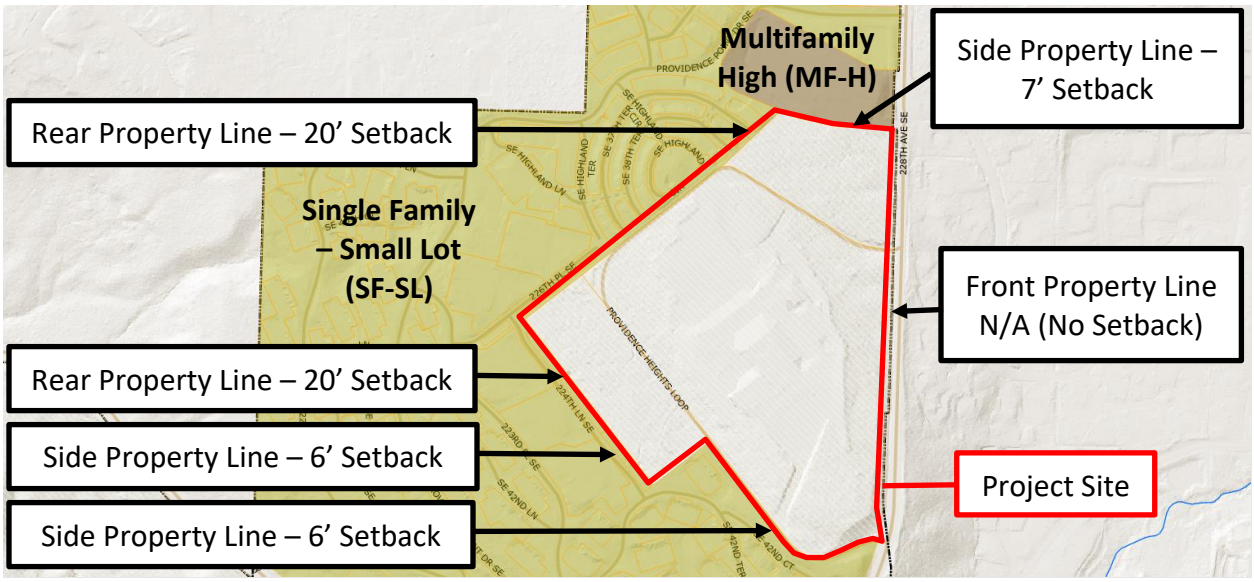


Figure 6: Property Lines and Required Setbacks over Excerpt of City of Issaquah Official Zoning Map.

The Applicant has identified applicable setbacks on the site plan (Attachment 97, Sheet C1.0LU – Civil Plans) and all proposed buildings and retaining walls are shown outside of the required setbacks, as in Table 6 below.

CONCLUSION: The proposal complies with applicable minimum setback requirements.

Table 6: Proposed Minimum Setbacks. Source: ISD (Attachment 97 - Civil Plans).

Property Line	Required	Proposed
North Side – Bellewood	7 feet	39.33 feet
Northwest Rear – Providence Point	20 feet	25.67 feet
Southwest Rear – Providence Point	20 feet	86.83 feet
Southwest Side – Providence Point	6 feet	14.67 feet
South Side – Providence Point	6 feet	21.17 feet
East Front – 228th Ave SE	N/A	0 feet

e. Build-To-Line

Table 18.07.480 requires a build-to-line of zero (0) to 20 feet. Footnote 6 of the Table defines the build-to-line[20] and applies it to the private street edge along the internal access roads. A private street consists of travel lanes providing the primary access to a principal building and any associated bicycle lanes and on-street

[20] Table 18.07.480, Footnote 6 states: The build-to line is the required placement of the building(s) on property frontage between the building and the right-of-way or private street edge if there is no right-of-way. ….

(parallel) parking. The site plan indicates the high school is approximately 16.83 feet from the private street edge (Figure 7, below) and the elementary school is approximately 18.5 feet from the private street edge (Figure 8, on the following page).

Because the property is outside of Olde Town and Central Issaquah, additional requirements in IMC 18.07.480(E)(13) apply to the space between the building and the street edge:

a) Vehicular circulation and/or parking are not allowed in the space in between the building and the property line.[21]
b) The space between the building and property line shall include landscaping with evergreen plantings to maintain year-round interest in combination with other hardscape elements, such as seat walls, benches, bicycle parking and other similar elements that enhance the social interactions and contribute to the public realm.

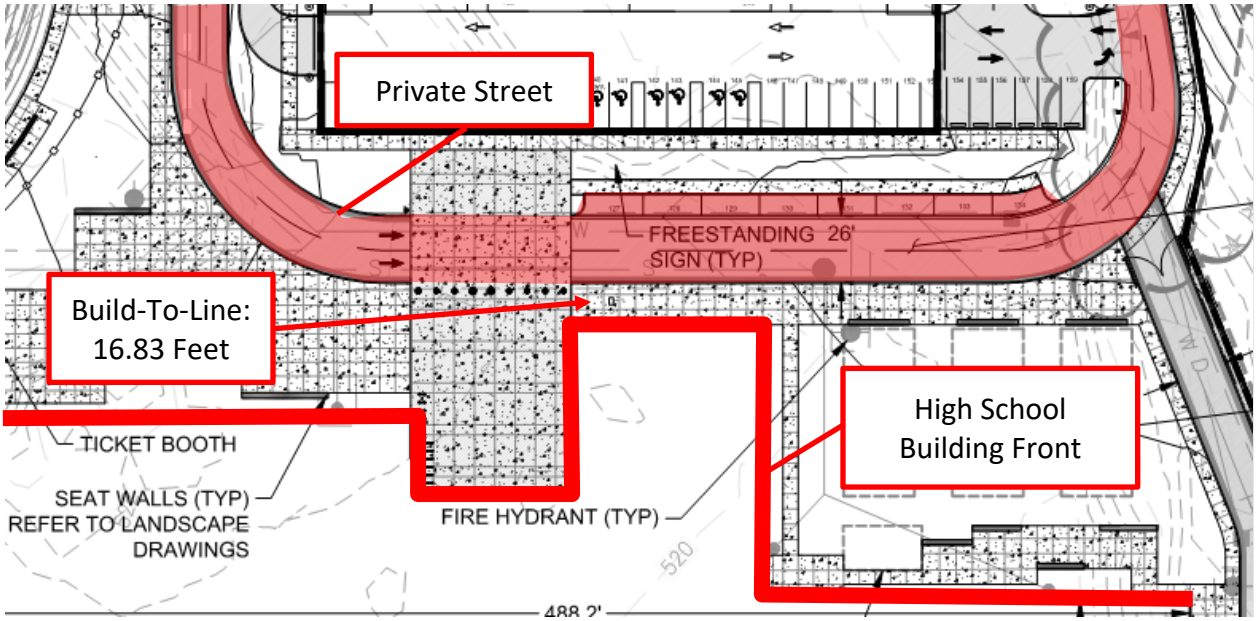


Figure 7: High School Build-To-Line. Annotations by Staff. Source: ISD (Attachment 97, Sheet C1.0LU – Civil Plans).

[21] Note that this requirement is applied between the building and the edge of the *private roadway*, in lieu of the property line, because the build-to-line is based on the internal access roads, consistent with Footnote 6 to Table 18.07.480.

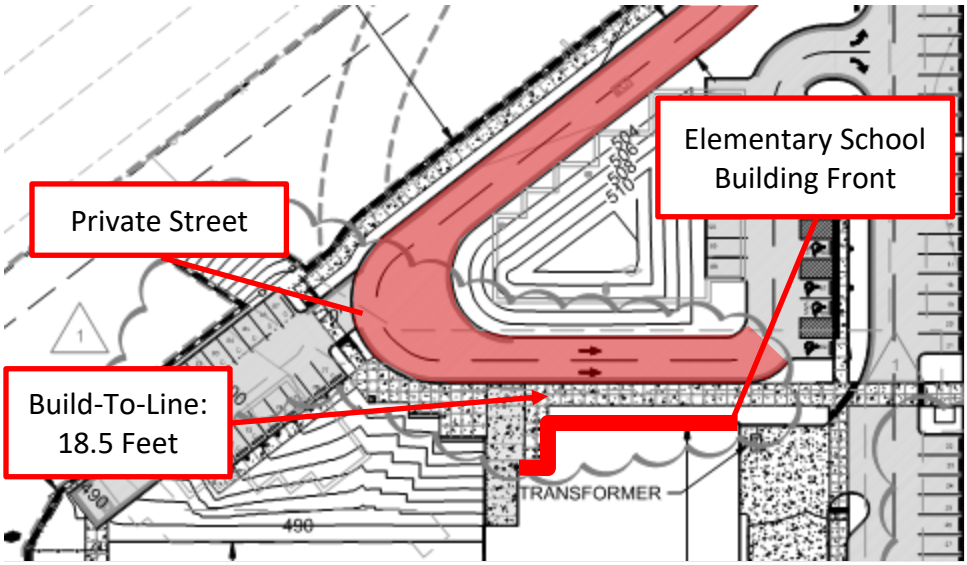


Figure 8: Elementary School Build-To-Line. Annotations by Staff. Source: ISD (Attachment 97, Sheet C1.0LU – Civil Plans).

Staff Analysis: The Applicant proposes to construct a pedestrian walkway for the full width of the space between the building and the street edge on the east side of the building. On the west side of the high school building, the Applicant proposes to expand the walkway into a large pedestrian plaza with seat walls and landscaping beds that vary in width from approximately six feet to approximately 21 feet. The Applicant proposes to construct a 10.5-foot-wide pedestrian walkway and eight-foot-wide landscape strip between the elementary school and the street edge. The proposed design does not include vehicular circulation or parking in the space between the buildings and the edge of roadway consistent with IMC 18.07.480(E)(13)(a). The spaces between the buildings include both landscaping and hardscape elements consistent with IMC 18.07.480(E)(13)(b).

CONCLUSION: The project complies with the build-to-line requirements.

f. Impervious Surface

Table 18.07.480 establishes a maximum impervious surface[22] area of 90 percent, calculated as the ratio of all impervious surface to the gross site area per IMC

[22] Pursuant to IMC 18.07.110, **Impervious surface** means: "A hard surface area which either prevents or retards the entry of water into the soil mantle as under natural conditions prior to development, and/or a hard surface area which causes water to run off the surface in greater quantities or at an increased rate of flow from the flow present under natural conditions prior to development.…Open, uncovered retention/detention facilities shall not be considered as impervious surfaces for the purposes of this definition." Table 18.07.480 Footnote 3 requires pervious pavers and pervious stormwater measures to be counted as impervious surface.

18.07.050(E). The gross site area is the total area of the subject property,[23] or 1,776,913 square feet according to the site survey (Attachment 97, Sheets C0.2LU-C0.5LU – Civil Plans). Per the definition of impervious surface, artificial sports field surfacing, such as that proposed in the stadium, is considered impervious. The Applicant provided an impervious surface coverage diagram identifying proposed impervious and pervious surfaces showing that the project proposal will have an estimated impervious surface coverage of approximately 996,913 square feet, or 56 percent of the site area (Attachment 94 – Impervious Surface Diagram)[24], which is different than the impervious surface coverage identified on the civil plan set. The remaining site area will be pervious in a combination of landscape buffers, landscape beds, and natural turf sports fields.

CONCLUSION: The proposal complies with impervious surface requirements.

IMC 18.07.480(E)(2) CONCLUSION: As conditioned and upon approval of the requested AAS, the proposal complies with applicable dimensional requirements for public schools.

3. IMC 18.07.480(E)(3): PROCESS FOR PUBLIC SCHOOLS AND PUBLIC BUILDINGS

IMC 18.07.480(E)(3) requires a Level 3 review process for public schools. As described in Section IV of this Staff Report, the project triggers higher-level permit requirements and all land use permits are consolidated for a single review and decision following Level 5 procedures.

IMC 18.07.480(E)(3) CONCLUSION: The proposal complies with process requirements for public schools.

[23] Pursuant to IMC 18.02.210, **Site area, gross** means: "The total area of a subject property prior to any deductions…"

[24] This value is different than the calculation shown on the Civil plan set, the impervious surface coverage diagram, and the stormwater technical information report. It was calculated using the pervious surface information on the impervious surface coverage diagram and the site area information from the survey, which is consistent with how impervious surface is defined in the IMC.

4. IMC 18.07.480(E)(4): ACCESS

SECTION SUMMARY:
The proposal meets applicable requirements for motorized and nonmotorized access. Primary access will be from an entry boulevard at 228th Avenue SE. Emergency access will be from the existing private Providence Heights Loop road. Nonmotorized access is provided along internal circulation facilities and connects all buildings and accessory facilities. An additional barrier-free nonmotorized connection is provided at the south end of the property frontage on 228th Avenue SE. The proposal requires AASs to reduce the total number of nonmotorized frontage connections provided and for relief from continuous walkway requirements; the Applicant has demonstrated compliance with applicable approval criteria.

IMC 18.07.480(E)(4) requires the applicant to provide and identify existing and proposed motorized and nonmotorized access to the facilities, including barrier-free, pedestrian, and bicycle infrastructure. The Applicant has provided a circulation plan (Attachment 97, Sheet C2.0LU – Civil Plan), a traffic analysis (Attachment 60 – Transportation Technical Report), and narrative information (Attachment 4 – Design Criteria Narrative Memo dated May 21, 2021) to explain the proposed motorized and nonmotorized access. The Applicant also provided a diagram explaining on-site vehicle circulation (see Figure 9 on the following page).

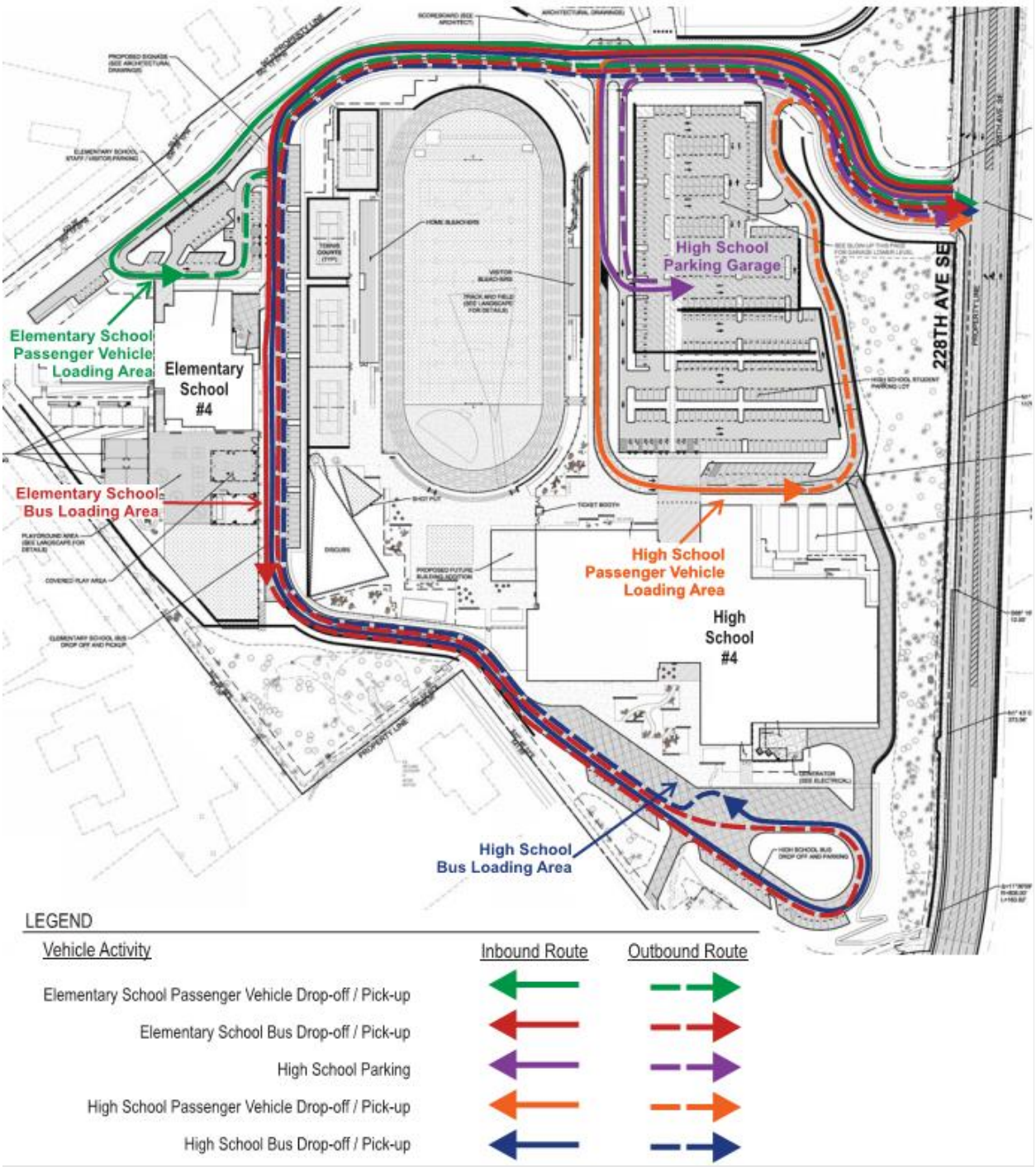


Figure 9: On-Site Circulation. Source: Transportation Technical Report prepared by Heffron Transportation Inc., dated September 1, 2020 (Attachment 60, Page 44).[25]

[25] The site plan base for this graphic has been updated slightly since publication of the traffic study. Internal circulation routes are the focus of this graphic and have not changed.

a. Motorized Access

According to the Applicant, the site will primarily be accessed from 228th Avenue SE, a north-south Principal Arterial within the City of Sammamish. From 228th Avenue SE, a new entry boulevard meanders through the trees, climbs up approximately 100 feet of elevation with terraced retaining walls on either side, and arrives at the top of the campus with the ball field complex to the right, the high school drive to the left for parent pick-up/drop-off and student and staff parking, and the elementary school drive straight ahead (Attachment 3 – Project Narrative). Buses continue straight (west) to serve the elementary school and south student entry of the high school. The proposed internal motorized circulation network includes, internal to the site, approximately 1,500 linear feet of queueing for elementary school student pick-up/drop-off and approximately 1,310 linear feet of queueing for high school student pick-up/drop-off.

A secondary access for emergency vehicles is provided at the existing driveway to Providence Heights Loop, a private roadway. Two vehicular gates will secure the driveway and school emergency entry such that they cannot be used by daily site traffic.

CONCLUSION: The proposal complies with motorized access requirements.

b. IMC 18.07.080(B): Nonmotorized Access

The Applicant has provided a network of nonmotorized pathways throughout the project extending from the 228th Avenue SE right-of-way and connecting all buildings and site elements (Attachment 4 – Design Criteria Narrative dated May 21, 2021). The Applicant is providing six-foot-wide sidewalks extending along both sides of the entry boulevard[26] and through the main intersection. From the main intersection, the nonmotorized pathway extends south to the high school along both sides of the street and extends west to the elementary school along both sides of the street until the street turns into a loop road, and the sidewalk continues around the exterior of the loop. From the elementary school, the nonmotorized pathway extends south past the elementary school playgrounds until it meets the bus parking area driveway. The nonmotorized pathway extends along the north side of the bus parking area driveway to connect to the high school and south/southeast to connect to 228th Avenue SE. See Attachment 97, Sheet C2.0LU fur the proposed nonmotorized circulation network. Portions of the main road and associated nonmotorized pathways do not comply with the City's adopted accessibility standards due to steepness of grade: the portion from 228th Avenue SE to the main intersection and the portion from the main intersection to the west side of the

[26] The grade along the entry boulevard to the main intersection is not ADA-accessible (Attachment 97 – Civil Plans). See *Pedestrian Facilities – Internal Walkways* section for additional information.

softball outfield. See *Pedestrian Facilities – Internal Walkways* for additional information.

To determine if the proposed nonmotorized facilities are adequate, this report analyzes the proposal for compliance with IMC 18.07.080(B).

c. IMC 18.07.080(B)(1)(a): Pedestrian Facilities – Public Sidewalks

Because City of Sammamish owns the 228th Avenue SE right-of-way, the Applicant is required to provide right-of-way sidewalks consistent with the Sammamish Municipal Code (SMC) instead of the *Issaquah Standards and Specifications: Streets and Related Work* and IMC 18.07.080(B)(1)(a) does not apply to the project.

CONCLUSION: This criterion is not applicable.

d. IMC 18.07.080(B)(1)(b): Pedestrian Facilities – Internal Walkways

The Applicant is required to provide barrier-free (ADA-accessible) walkways through a development between public entrances and the nearest public sidewalk using the most direct route through the development pursuant to IMC 18.07.080(B)(1)(b). Due to the grade of the entry boulevard, which is not ADA compliant, the Applicant provided a separate ADA-accessible route from the proposed public sidewalk along 228th Avenue SE (see Figure 10 on the following page). The ADA-accessible route is located at the southeast corner of the property and connects to the south student entrance of the high school by traveling northward along the east side of the bus loop (Attachment 97 – Civil Plans). This is the most direct route possible due to the grade of the property along the 228th Avenue SE frontage. 228th Avenue SE does not currently provide pedestrian or bicycle infrastructure in the vicinity of the site, but the proposed frontage improvements will connect nonmotorized access from SE 40th Street to Providence Point Drive SE. The interior nonmotorized network from the main intersection southward is ADA-accessible and barrier-free except for a steeply-sloping portion of the elementary school roadway in the vicinity of the softball outfield. The interior nonmotorized circulation network provides extensive direct routes to each of the proposed buildings, structures, and amenities and connects to the 228th Avenue SE frontage.

CONCLUSION: The proposal complies with IMC 18.07.080(B)(1)(b).

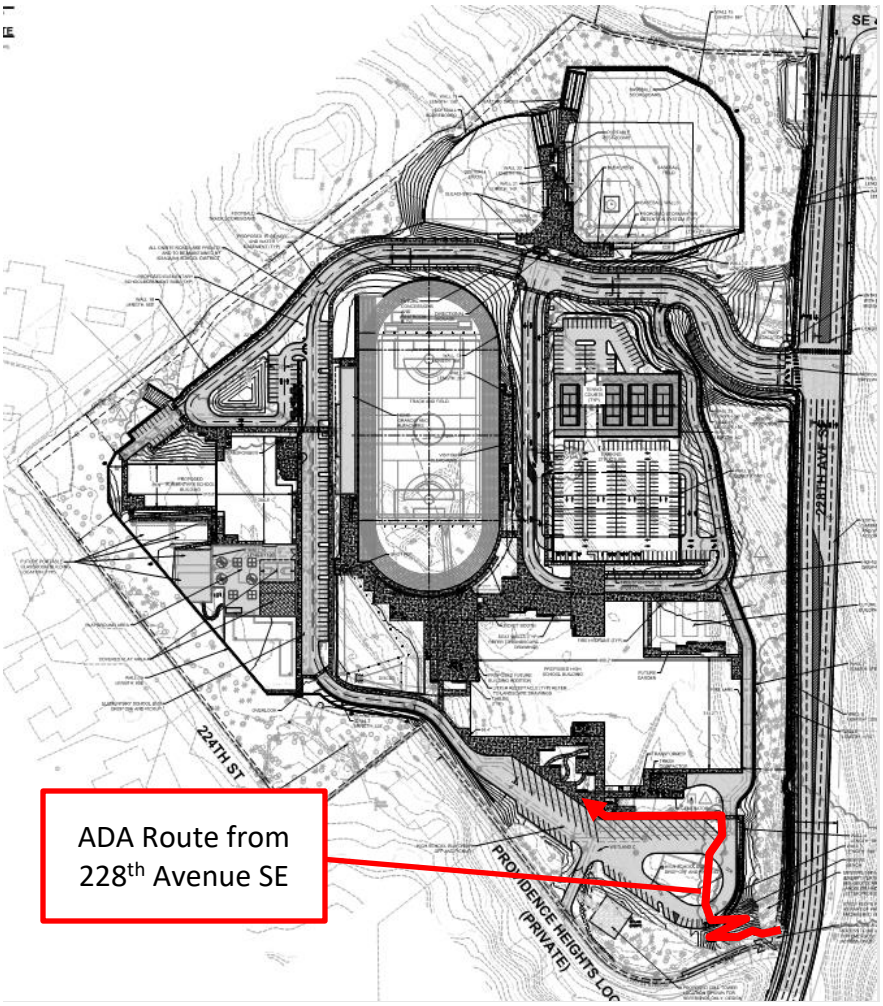


Figure 10: ADA Route. Annotations by Staff. Source: ISD (Attachment 97, Sheet C1.0LU – Civil Plans).

e. IMC 18.07.080(B)(1)(b)(1): Pedestrian Facilities – Walkway Connection Frequency

Pursuant to IMC 18.07.080(B)(1)(b)(1), the Applicant is required to provide one connection to a public sidewalk plus one additional connection for each 250 feet of street frontage. The subject property will have approximately 1,740 linear feet of public street frontage after frontage improvements are dedicated to the City of Sammamish and would therefore require a total of eight walkway connections:

$$1 + \frac{1{,}740}{250} = 7.96, \text{ rounded up to } \mathbf{8 \text{ frontage connections}}$$

CONCLUSION: The Applicant is proposing three frontage connections and requires an AAS to authorize this reduction (see next section).

f. AAS21-00006, Adjustment to IMC 18.07.080(B)(1)(b)(1), Frontage Connections

The Applicant has requested an AAS (**Permit no. AAS21-00006**) to reduce the number of required frontage connections from eight to three pursuant to the AAS criteria in IMC 18.07.080(C), identified in Figure 11, below.

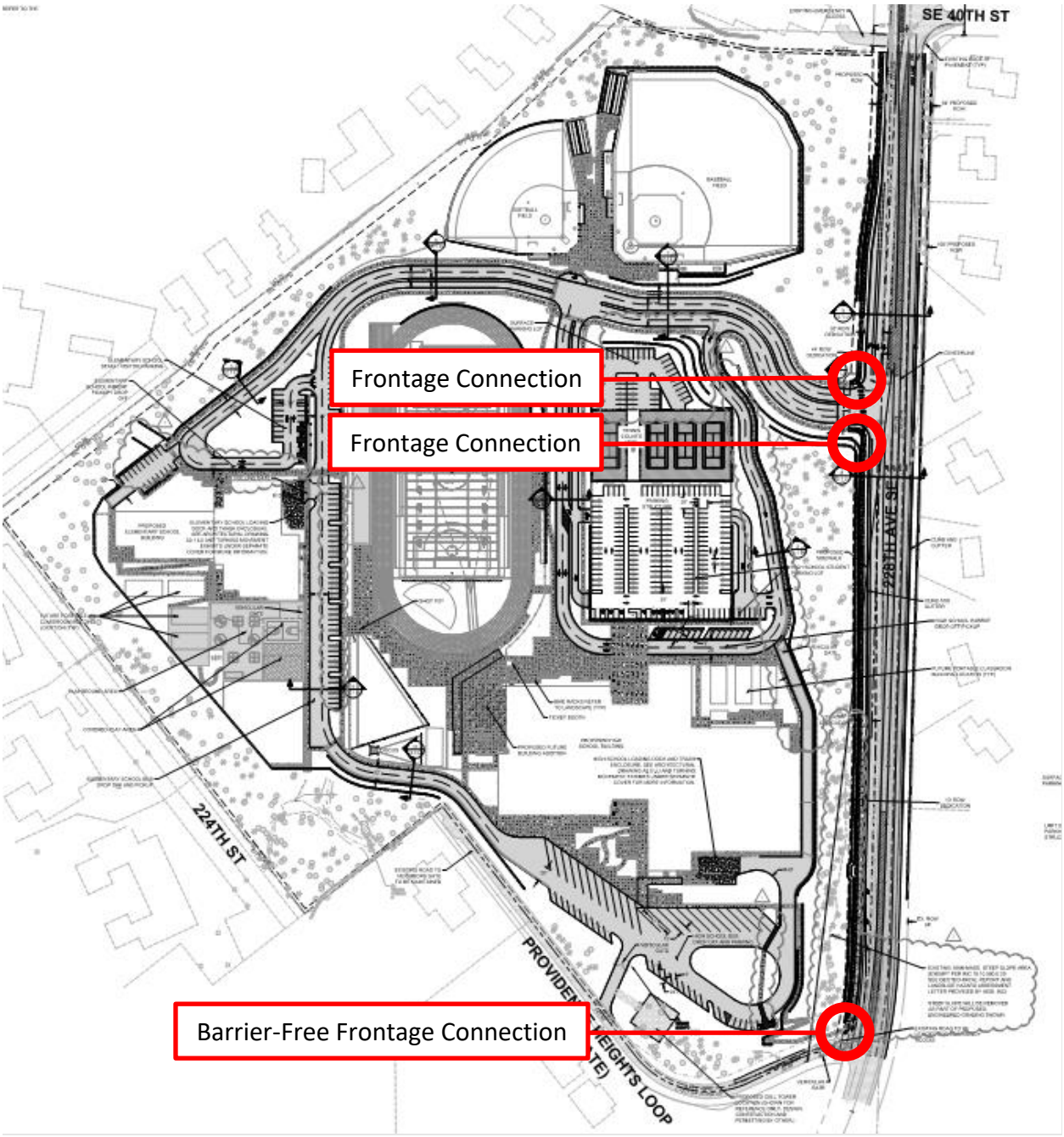


Figure 11: Proposed Nonmotorized Frontage Connections. Source: ISD Application Materials (Attachment 97, Sheet C2.0LU – Civil Plans).

The Applicant has provided information to determine conformance with the approval criteria set forth in IMC 18.07.350[27] and IMC 18.07.080(C) (Attachment 33 – Nonmotorized Criteria Narrative):

a. *Consistency: The adjustment(s) shall provide consistency with the intent, scale and character of the zoning district involved.*
   Staff Analysis: The proposed frontage connections are shown in Figure 11, on previous page. According to IMC 18.06.090, the intent of the CF-F zone is to provide for service-oriented development for the larger community that is compatible with surrounding land uses, safe and functional, and consistent with Issaquah's Comprehensive Plan. As described in Section VII.A.7 of this Staff Report (above), the project is consistent with the purpose and intent of the CF-F zone. The proposal meets applicable dimensional requirements for building massing to ensure compatibility of scale with the surrounding community and is required to comply with applicable design requirements for buildings in the CF-F zone. The proposed adjustment is consistent with the character of other, similar facilities along 228th Avenue SE, including Skyline High School and Pine Lake Middle School. The proposal satisfies this criterion.

b. *Impacts: The adjustment(s) does not negatively impact: (1) Adjacent property owners; (2) The safety of the general public; and (3) The visual character, scale and design compatibility of the surrounding area.*
   Staff Analysis: Reducing the number of frontage connections will not negatively impact adjacent property owners, the safety of the general public, or the visual character, scale, and design compatibility of the surrounding area. Reducing the number of frontage connections will not cause an increase to traffic (nonmotorized or other traffic),[28] noise,[29] or other potential effects that could impact adjacent property owners. Reducing the number of frontage connections will protect the visual character of the site and vicinity and enhance design compatibility with the adjacent property owners by allowing a greater number of trees to be retained. According to the Applicant additional frontage connections are possible but would impact the ability to retain trees and natural landforms that contribute to the visual character along the 228th Avenue SE frontage (Attachment 33 – Nonmotorized Connections Narrative); public comment is strongly in favor of retaining as many trees as possible. Adjacent property owners will be able to access the site and its amenities from the proposed frontage connections including the barrier-free access on the south end of the

[27] Criteria for "Other standards not identified" in IMC 18.07.350 are used here because adjustments to the nonmotorized facilities requirements in IMC 18.07.080(C) refer specifically to these criteria.
[28] The project overall will entail trip generation causing an increase in traffic. The traffic increase is not related to the request to reduce the number of pedestrian frontage connections.
[29] The project overall will entail additional noise-generating activities, including both exempt and non-exempt noises. The noise increase is not related to the request to reduce the number of pedestrian frontage connections.

property. There are no safety concerns related to the reduction. The proposal complies with this criterion.

c. *Intent: The adjustment of the standard(s) will be equal to, or superior in, fulfilling the intent and purpose of the original requirement(s).*
Staff Analysis: Pursuant to IMC 18.07.080(A), the purposes of requiring nonmotorized facilities are to:
   a) increase safe nonmotorized access to and mobility through all parts of the city;
   b) help remove nonmotorized and vehicular movement conflicts; and
   c) support transportation options that contribute to reduced traffic congestion, improved transit connections, improved air quality, reduced fuel consumption, and improved physical fitness.

   Additional Staff Analysis: Reducing the number of frontage connections will be equal to the original requirements in fulfilling these purposes. There are currently no existing nonmotorized connections or pathways into the site, either adjacent to the access roads or elsewhere along the public street frontage. Pedestrians can only approach the site from the north or the south; there are no points at which to approach the site in between and additional frontage connections only impact trees without providing additional pedestrian access. Pedestrians are able to walk along the internal access roads but would share the roads with motorized vehicles. Provision of three connections from the 228th Avenue SE frontage to the proposed nonmotorized circulation network represents an increase in safe nonmotorized access to the site that complies with Issaquah's accessibility requirements. Connection to the 228th Avenue SE right-of-way will create new opportunities for nonmotorized access in the immediate vicinity, reducing potential nonmotorized and vehicular movement conflicts. The frontage connections will support transportation options, although there are very limited nonmotorized and transit facilities in the surrounding vicinity. The proposal complies with this criterion.

d. *Additional Approval Criteria: Additional approval criteria, as may be specified by the Planning Director/Manager, based on best professional judgment and knowledge of the Administrative Adjustment requested.*
Staff Analysis: The Director has not specified any additional approval criteria.

e. *Adjustment is necessary for compliance with historic requirements.*
Staff Analysis: The Applicant has indicated this does not apply. This criterion is optional and compliance is not required.

f. *Adjustment is necessary to avoid encroachment into a critical area or preserve a significant natural feature such as a large tree.*

Staff Analysis: The Applicant is proposing to retain a substantial amount of existing, mature vegetation along the 228th Avenue SE right-of-way. Tree retention is broadly supported by the surrounding community, the City of Sammamish, and the City of Issaquah. Upon review of the plans, Staff determined that requiring all eight frontage connections would require impacts to, including removal of, the trees to be retained along the 228th Avenue SE right-of-way. The requested adjustment is necessary to preserve these trees, which are considered a significant natural feature by the surrounding community. The proposal complies with this criterion.

g. *Adjustment is supported by public dedication of nonmotorized facilities.*
Staff Analysis: The Applicant has indicated this does not apply. This criterion is optional and compliance is not required. The project does, however, include the dedication of nonmotorized frontage improvements, including bicycle lane and sidewalks, to the City of Sammamish. The proposed frontage connections will tie into the dedicated nonmotorized facilities.

AAS21-00006, Frontage Connections: COMPLIES. Based on the foregoing analysis, the Applicant has demonstrated the request to reduce the number of frontage connections from eight to three (**Permit no. AAS21-00006**) **COMPLIES** with applicable approval criteria in IMC 18.07.350 and IMC 18.07.080(C).

CONCLUSION: Upon approval of the AAS request, the proposal will comply with the frontage connection requirement.

g. IMC 18.07.080(B)(1)(b)(2)-(3): Pedestrian Facilities – Multiple Building Walkway Systems

Pursuant to IMC 18.07.080(B)(1)(b)(2) and (3), developments containing more than one building and/or buildings exceeding 15,000 square feet are required to provide walkway systems that allow safe and efficient pedestrian circulation within the development. The walkway system is required to: (1) link all public entrances of the buildings to each other and to the nearest public sidewalk, trail, or shared use corridor; (2) provide a perimeter walkway that is generally parallel to and continuous along all building facades with public entrances or associated landscaping areas; (3) connect at least one walkway through the parking lot that is generally perpendicular to buildings and provides a walkway route between buildings in addition to perimeter walkways; (4) in instances where building facades with any associated outdoor display and storage face the parking lot and exceed two hundred fifty feet in length, provide an additional walkway through the parking lot for each increment of two hundred fifty linear feet; (5) provide a continuous walkway on at least one side of parking lot aisles that do not contain angle parking; (6) provide a continuous walkway on both sides of private roadways through a development that are not part of a parking lot; and (7) not result in walkway dead

ends that result in a pedestrian being unnecessarily required to cross a street or other vehicular area and/or take a circuitous route in order to resume travel on a walkway.

The Applicant has provided an extensive internal nonmotorized network that links all public entrances of the buildings and athletic facilities to each other and to the proposed sidewalk along 228th Avenue SE (Attachment 97, Sheet C2.0LU – Civil Plans). The proposed walkways are generally parallel to and continuous along all sides of the building facades with public entrances; there are no walkways proposed on the east side of the high school building, where emergency access and service vehicles may travel, but there are no public entrances on that side (Attachment 97, Sheet C2.0LU – Civil Plans). Pedestrian connectivity is provided around, through, and to parking lots and the parking structure (Attachment 97, Sheet C2.0LU Civil Plans and Attachment 99, Landscape Plans). The walkways do not result in any dead ends or unnecessary road crossing or circuitous routes. Note that the bus loop driveway extends from the bus parking lot to the south end of the elementary school's eastern access road and walkways are not required on both sides of the driveway. The Applicant has generally provided a continuous walkway on both sides of the roadways through the development except in certain locations. The Applicant is proposing to provide walkways on only one side of the roadways in the following locations: the west side of the east (exiting) half of the high school pick-up/drop-off road, along the entire west side of the emergency access drive on the west side of the high school, and adjacent to the building on the east side of the emergency access drive on the west side of the high school (see Figure 12 on the following page).

CONCLUSION: The Applicant requires an AAS to approve the proposal.

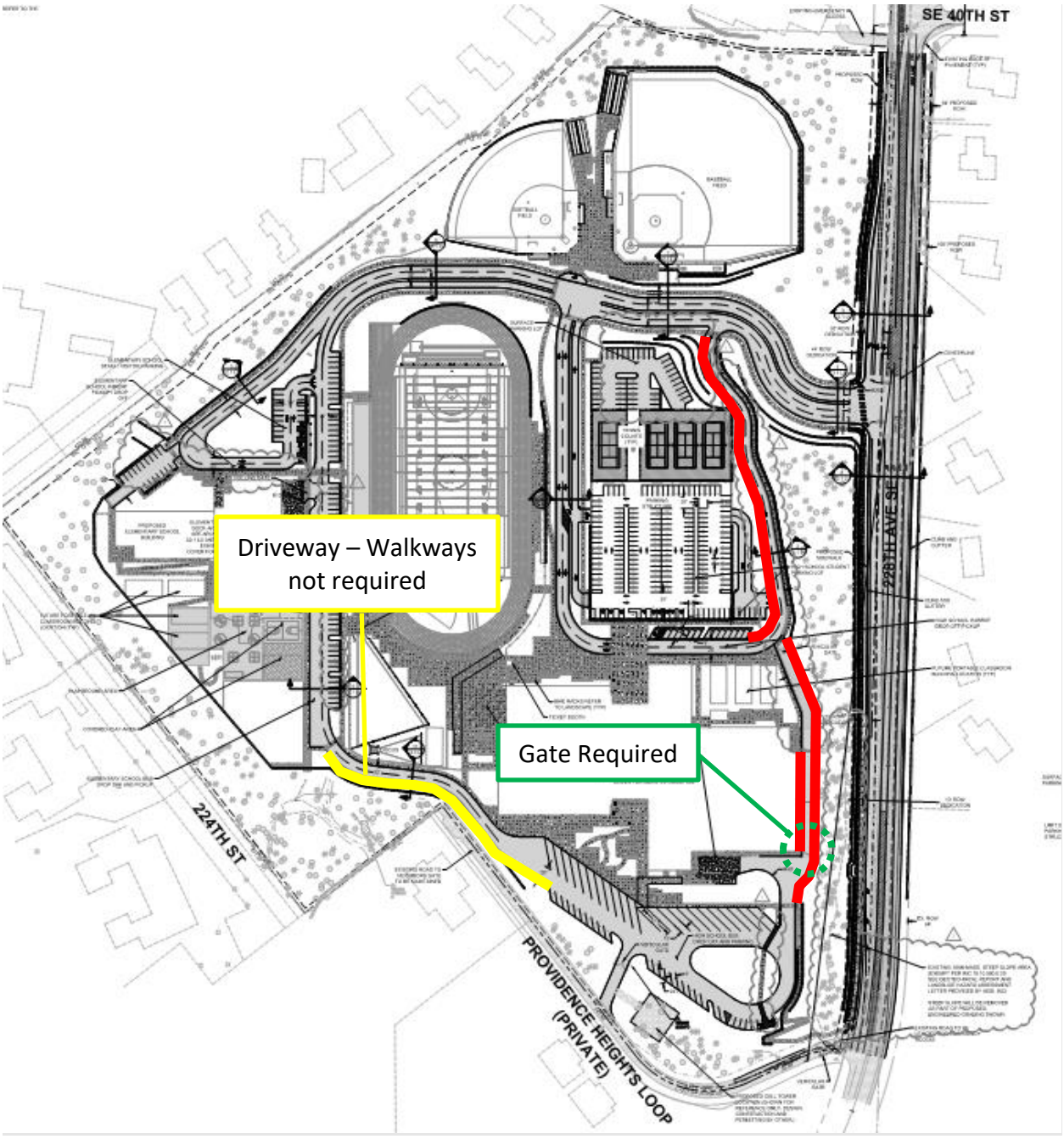


Figure 12: Proposed Relief from Continuous Nonmotorized Walkways along Circulation Facilities. Source: ISD Application Materials (Attachment 97, Sheet C2.0LU – Civil Plans). Red: walkways required in these areas. Green: gate required in this area. Yellow: driveway; walkways not required in this area.

h. AAS21-00005, Adjustment to IMC 18.07.080(B)(1)(b)(2)(F), Continuous Walkways on Both Sides of Private Roads

The Applicant has provided information to determine conformance with the approval criteria set forth in IMC 18.07.350[30] and IMC 18.07.080(C) in Attachment 31 – Nonmotorized AAS Narrative:

a. *Consistency: The adjustment(s) shall provide consistency with the intent, scale and character of the zoning district involved.*
Staff Analysis: According to IMC 18.06.090, the intent of the CF-F zone is to provide for service-oriented development for the larger community that is compatible with surrounding land uses, safe and functional, and consistent with Issaquah's Comprehensive Plan. As described in Section VII.A.7 of this Staff Report (above), the project is consistent with the purpose and intent of the CF-F zone. The proposal meets applicable dimensional requirements for building massing to ensure compatibility of scale with the surrounding community. In addition, the project will comply with applicable design requirements for buildings in the CF-F zone. The proposal satisfies this criterion.

b. *Impacts: The adjustment(s) does not negatively impact: (1) Adjacent property owners; (2) The safety of the general public; and (3) The visual character, scale and design compatibility of the surrounding area.*
Staff Analysis: The proposed adjustment will relieve the Applicant from providing walkways on the west side of the east (exiting) half of the high school pick-up/drop-off road, along the entire west side of the emergency access drive on the west side of the high school, and adjacent to the building on the east side of the emergency access drive on the west side of the high school (see Figure 12, on previous page). These are internal walkways that will not impact adjacent properties or the visual character, scale, and design compatibility of the project with the surrounding area. The safety of the general public, and of site users in particular, will also not be negatively impacted. Ample pedestrian connectivity is available throughout the site, and student safety is protected by eliminating pedestrian walkways in these areas by preventing access in areas with limited supervision and preventing unnecessary street crossings. The proposal complies with this criterion.

c. *Intent: The adjustment of the standard(s) will be equal to, or superior in, fulfilling the intent and purpose of the original requirement(s).*
Staff Analysis: Pursuant to IMC 18.07.080(A), the purposes of requiring nonmotorized facilities are to: (1) increase safe nonmotorized access to and mobility through all parts of the city; (2) help remove nonmotorized and

[30] Criteria for "Other standards not identified" in IMC 18.07.350 are used here because adjustments to the nonmotorized facilities requirements in IMC 18.07.080(C) refer specifically to these criteria.

vehicular movement conflicts; and (3) support transportation options that contribute to reduced traffic congestion, improved transit connections, improved air quality, reduced fuel consumption, and improved physical fitness. The Applicant has demonstrated that the requested adjustment will increase safety and remove potential nonmotorized and vehicular movement conflicts by limiting the number of pedestrian/vehicular crossings at student drop-off lanes and other locations around the project site. Eliminating walkways in the proposed locations will have no impact on the support of transportation options that contribute to reduced traffic congestion because there is ample nonmotorized connectivity throughout the site. To ensure the emergency access road on the east side of the high school is not used as a circulation facility by daily motorized traffic, the Applicant will be required to install a gate at the south end in addition to the gate proposed at the north end, identified in Figure 12 on page 57 of this Staff Report. **[CONDITION 9]** As conditioned, the proposal complies with this criterion.

d. *Additional Approval Criteria: Additional approval criteria, as may be specified by the Planning Director/Manager, based on best professional judgment and knowledge of the Administrative Adjustment requested.*
Staff Analysis: The Director has not specified any additional approval criteria.

e. *Adjustment is necessary for compliance with historic requirements.*
Staff Analysis: The Applicant has indicated this does not apply. This criterion is optional and compliance is not required.

f. *Adjustment is necessary to avoid encroachment into a critical area or preserve a significant natural feature such as a large tree.*
Staff Analysis: The Applicant is proposing to retain a substantial amount of existing, mature vegetation along the 228th Avenue SE right-of-way. Tree retention is broadly supported by the surrounding community, the City of Sammamish, and the City of Issaquah. Upon review of the plans, Staff determined that requiring the walkways on the east side of the high school and parking garage would necessitate additional encroachment into the proposed tree retention area, requiring additional grading and tree removal. The requested adjustment supports the retention of these trees, which are considered a significant natural feature by the surrounding community. The proposal complies with this criterion.

g. *Adjustment is supported by public dedication of nonmotorized facilities.*
Staff Analysis: The Applicant has indicated this does not apply. This criterion is optional and compliance is not required. The project does, however, include the dedication of nonmotorized frontage improvements, including bicycle lane and sidewalks, to the City of Sammamish. The nonmotorized walkways will tie into the dedicated nonmotorized facilities.

AAS21-00005, Continuous Walkways on Both Sides of Private Roads: COMPLIES. Based on the foregoing analysis, the Applicant's request (**Permit no. AAS21-00005**) **COMPLIES** with the review criteria in IMC 18.07.350 and IMC 18.07.080(C) for providing walkways on only one side of internal roads.

CONCLUSION: Upon approval of the AAS request, the proposal will comply with the continuous walkway requirement in IMC 18.07.080(B)(1)(b)(2)(F).

i. IMC 18.07.080(B)(1)(b)(4)-(6) Pedestrian Facilities – Other Requirements

In compliance with IMC 18.07.080(B)(1)(b)(4)-(6), the provided walkways are at least five feet wide, are composed of permanent and visually distinctive materials that comply with ADA requirements, and are physically separated from vehicular grade by landscaping strips and/or curbs (Attachment 97, Sheet C2.0LU – Civil Plans). The Applicant provided photometric plans demonstrating that the lighting will comply with applicable outdoor lighting standards set forth in IMC 18.07.107 (see Section VII.C.2 of this Staff Report for additional information) and IMC 18.07.080(B)(1)(b)(7) (Attachment 101 – Electrical Plans/Photometrics). There are no transit stops along the property frontage and no walkways to bus stops are therefore required per IMC 18.07.080(B)(1)(b)(8).

CONCLUSION: The proposal complies with other pedestrian facilities requirements.

j. IMC 18.07.080(B)(1)(c) – Crosswalks

The Applicant has proposed all crosswalks to be composed of the same concrete materials as the walkways. The concrete is permanent and visually distinctive from parking lot and driveway asphalt material. The proposal complies with crosswalk requirements in IMC 18.07.080(B)(1)(c) and will be required to comply with the Issaquah Street Standards, including the Typical Crosswalk Stripe (Standard Detail No. T-37).

CONCLUSION: As conditioned, the proposal complies with crosswalk requirements.

k. IMC 18.07.080(B)(1)(d) - Benches

Building entrances are all more than 250 feet from the public right-of-way and, pursuant to IMC 18.07.080(B)(1)(d), at least one bench is required near the midpoint along the private walkways serving the building entrances. The Applicant has not

provided enough information to determine compliance with this requirement. Compliance must be demonstrated with construction permits. **[CONDITION 10]**

CONCLUSION: As conditioned, the proposal complies with bench and seating requirements.

CONCLUSION: Upon approval of the AAS requests (file nos. **AAS21-00005**, Continuous Walkways, and **AAS21-00006**, Nonmotorized Frontage Connections) and as conditioned, the proposal will comply with all applicable pedestrian facilities requirements in IMC 18.07.080(B)(1).

l. IMC 18.07.080(B)(1), Bicycle and Shared Use Facilities

The proposal is also required to provide bicycle and shared use facilities consistent with IMC 18.07.080(B)(2). Because the City of Sammamish owns the 228th Avenue SE right-of-way, the Applicant is required to provide bicycle lanes consistent with the Sammamish Municipal Code (SMC) instead of the *Issaquah Standards and Specifications: Streets and Related Work* and the *Comprehensive Plan Bicycle and Shared Use Corridor Map.*

The Applicant is providing bicycle parking consistent with IMC 18.09.030(I) (see Section VII.A.12, Parking, of this Staff Report for additional information). No other bicycle or shared use facilities requirements apply to this proposal.

CONCLUSION: The proposal complies with applicable bicycle and shared use facilities requirements.

m. Right-of-Way Improvements

The Applicant is required by the City of Sammamish to provide right-of-way improvements to support a projected increase in traffic associated with the proposal.[31] Proposed right-of-way improvements include widening 228th Avenue SE from a four-lane section at SE 40th Street to a five-lane section along the property, installing a traffic signal at the school entry boulevard, providing a bike lane on each side of the road, and providing a six-foot-wide sidewalk along the west side of the road. While a portion of the signal improvements will extend beyond the right-of-way onto the proposed project site within the City of Issaquah, the City of Sammamish is responsible for reviewing and approving the proposed improvements, including issuing construction permits. The Cities of Issaquah and Sammamish intend to develop an interlocal agreement to clarify ownership, operation, and maintenance of the new signal.

[31] City of Sammamish owns the 228th Avenue SE right-of-way.

The City of Issaquah recently completed the installation of a new traffic signal and associated channelization at SE 43rd Way and Providence Point Drive SE, south of the project site. The proposed right-of-way improvements will extend from the south end of the site to the new intersection, including a four-lane road section and sidewalk. The four-lane road section will tie in to the five-lane road section near the south end of the project site. Staff recommends ISD provide a fiber communication connection with the proposed right-of-way improvements, consistent with the City of Issaquah Street Standards Section S *Traffic Signals.* Section S of the Standards require new signal installations to interconnect with existing City traffic control facilities using fiber optic cables and switches. The recommended fiber connection will be further developed as part of the Interlocal Agreement between the City of Sammamish and the City of Issaquah **(Condition 47)**.

IMC 18.07.480(E)(4) CONCLUSION: The project has identified motorized and nonmotorized access, including barrier-free, pedestrian, and bicycle infrastructure. As conditioned and upon approval of the requested AASs, the proposal complies with applicable access requirements.

5. IMC 18.07.480(E)(5): ENVIRONMENTAL IMPACTS

IMC 18.07.480(E)(5) requires the Applicant to identify the existing natural environment, proposed impacts, and required mitigation. Environmental (SEPA) review was performed by ISD in its capacity as Lead Agency for the project. Potential impacts to the existing natural environment were identified, along with required mitigation measures (Attachment 74 – SEPA MDNS). The Applicant is proposing impacts to Wetland C that require review under Chapter 18.10 IMC, and these impacts are addressed in Section VII.B of this Staff Report. Further environmental review is not required.

IMC 18.07.480(E)(5) CONCLUSION: The project meets applicable protection and development standards in Chapter 18.10 IMC and is providing mitigation as required. The proposal complies with applicable environmental review, impact, and mitigation requirements.

6. IMC 18.07.480(E)(6): LINKAGE TO COMMUNITY FACILITIES

The Applicant is required to provide and identify pedestrian and bicycle linkage to community facilities in the area pursuant to IMC 18.07.480(E)(6). There are no nearby community facilities, and, therefore, pedestrian and bicycle linkage is not required.

IMC 18.07.480(E)(6) CONCLUSION: There are no community facilities in the vicinity, and, therefore, this requirement is inapplicable.

7. IMC 18.07.480(E)(7): MAINTENANCE

The Applicant is required to identify long-term maintenance requirements, funding options, and a long-term maintenance program pursuant to IMC 18.07.480(E)(7). ISD indicated that maintenance will be similar to other facilities the School District owns and

maintains, and that maintenance is included in the District's operational costs for landscaping, athletic facilities, buildings, utilities, stormwater systems, and other maintenance needs (Attachment 17 – CF Standards Memo). Operational costs are funded by taxpayer dollars through a variety of sources. Long-term maintenance of the schools will be included in ISD's annual budget and completed by District staff or a third party hired by the District (Attachment 17 – CF Standards Memo).

IMC 18.07.480(E)(7) CONCLUSION: The project has identified long-term maintenance and operations needs and a maintenance program; the project complies with this requirement.

8. IMC 18.07.480(E)(8): PHASING

Phasing is required to be identified pursuant to IMC 18.07.480(E)(8). The Applicant has indicated that phasing of project construction will occur (Attachment 72– Construction Phasing Narrative). **[CONDITION 11]** Phase 1 of the project will consist of site improvements and the high school, and the Applicant plans to begin construction of Phase 1 improvements in 2022. Phase 2 of the project will consist of the elementary school and some related improvements (school building, service area, and playground) at a future date. Construction of Phase 2 improvements is anticipated to begin within three years. The approximate geographic area of Phase 2 is shown in Figure 13, on the following page.

To minimize future construction-related impacts to school operations and trucking impacts, the Phase 1 work will include site grading and some other construction elements within the Phase 2 geographic area. Improvements to be installed in the Phase 2 geographic area as part of Phase 1 include exterior retaining walls, utility stubs, earthwork to establish the elementary school subgrade, and construction of temporary ponds for stormwater and sediment control. Following construction of Phase 1 improvements, material will be stockpiled on the elementary school pad for future use. The stockpile is required to be hydroseeded and fenced. **[CONDITION 12]** Any planting proposed within the vegetated buffer surrounding the Phase 2 geographic area is required to be completed with Phase 1 of the project. **[CONDITION 13]**

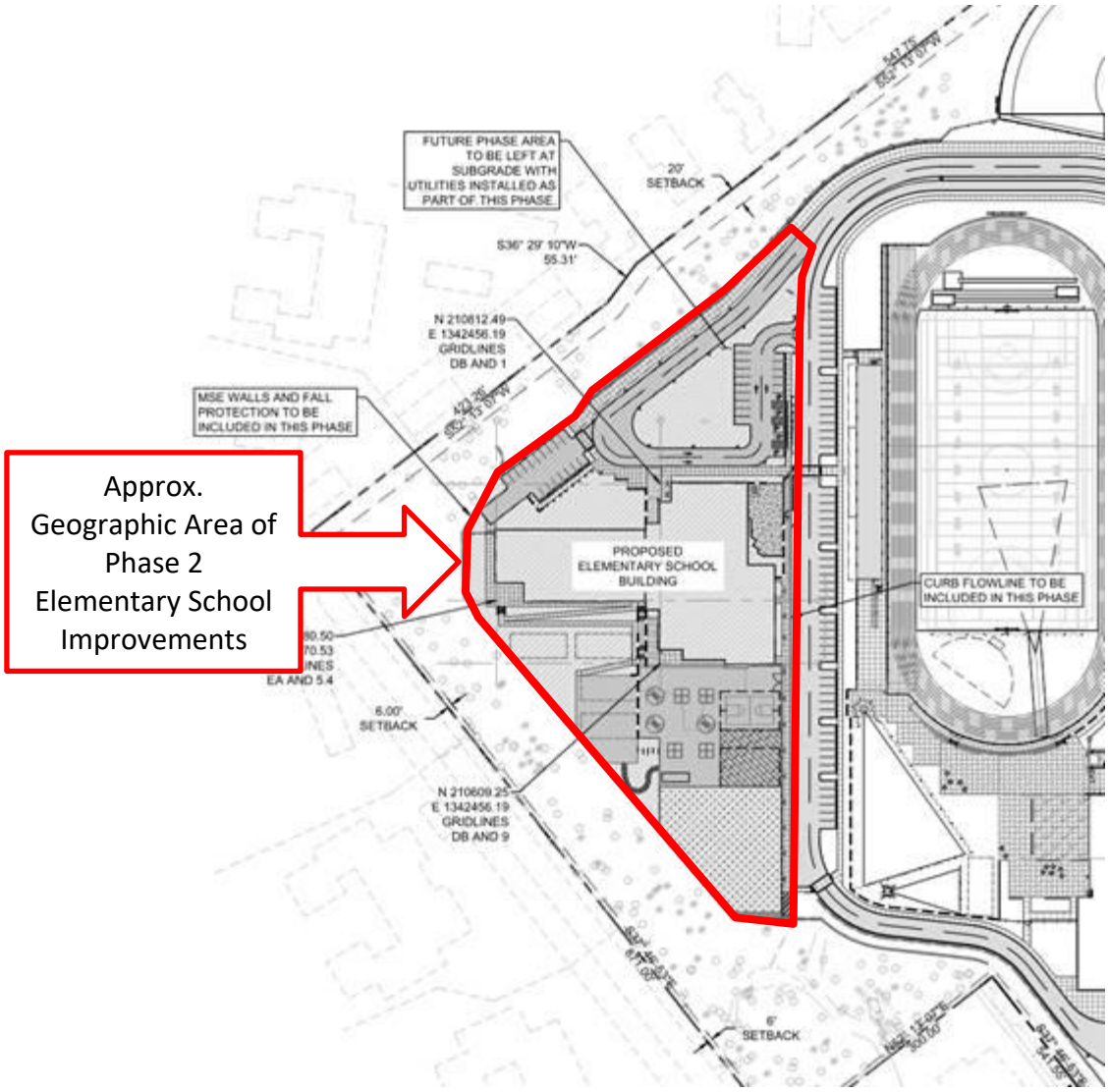


Figure 13: Phase 2 Elementary School Improvements. Source: Construction Phasing and Sequencing Memo (Attachment 72).

The project site plan also identifies potential future phases, including a future building expansion at the high school and four portable buildings each at the high school and the elementary school (eight total portable buildings) (Attachment 97, Sheet C0.1LU – Civil Plans). At this time, the potential future phases have not been designed or planned beyond what is shown in the MSP and SDP, and specific phasing information for those potential phases is not required. The location of the potential future phases is adequate for land use review.

IMC 18.07.480(E)(8) CONCLUSION: Phasing information has been provided and the proposal complies with this requirement.

9. IMC 18.07.480(E)(9): SAFETY

IMC 18.07.480(E)(9) requires that the safety of all users is ensured using posted regulations and user directions, adequate lighting, marked access points, and other methods. This will be verified during construction permit review. **[CONDITION 14]** The Applicant indicated that the facility has been designed with wayfinding signage to inform users of access points and provided a photometric analysis of the site showing the proposed lighting system will provide a safe condition for students and users of the facility (Attachments 4 and 101 – Design Criteria Narrative Memo dated May 21, 2021, Electrical Site Plans). Additionally, safety has been considered in the design and location of nonmotorized pathways, fencing and retaining walls, and the design and placement of landscaping materials (Attachments 97 and 99 – Civil and Landscape Plans).

IMC 18.07.480(E)(9) CONCLUSION: The project will include regulations, directions, lighting, and other necessary safety features. As conditioned, the project complies with this requirement.

10. IMC 18.07.480(E)(10): USERS

ISD provided information on the potential users and general percentage of the community that will benefit from the facility pursuant to IMC 18.07.480(E)(10) (Attachment 17 – CF Standards Memo). According to ISD, the facility will provide public education as required by the State of Washington and the education of students provides a benefit to the entire community (Attachment 17 – CF Standards Memo). Public use of athletic facilities outside of school hours is a secondary benefit of the project (Attachment 17 – CF Standards Memo). The Applicant has minimized potential conflict between user groups by separating the schools to minimize interaction between elementary school and high school students, by providing supervision during the school day, and by establishing facility use and scheduling policies (Attachment 17 – CF Standards Memo).

IMC 18.07.480(E)(10) CONCLUSION: Information on potential users and community benefits has been provided. The project complies with this requirement.

11. IMC 18.07.480(E)(11): WASTE AND RECYCLING

Pursuant to IMC 18.07.480(E)(11), the Applicant is required to provide and identify waste and recycling receptacles. The Applicant identified a waste enclosure containing a trash compactor and three dumpsters on the south side of the high school, between the high school building and the bus loop (Attachment 97, Sheet C2.0LU and Attachment 99, sheet A2.0LU – Civil Plans and Architectural Plans & Building Elevations). The Applicant also identified a combination loading dock and waste enclosure with space for three dumpsters on the east side of the elementary school (Attachment 97, Sheet C2.0LU and Attachment 99, sheet A2.1LU – Civil Plans and Architectural Plans & Building Elevations). ISD also indicated that, similar to other district facilities in the City of Issaquah, the site will have garbage and recycling receptacles throughout the site and have onsite collection points for scheduled pickup consistent with District policies

(Attachment 17 – CF Standards Memo). Recology reviewed and approved the proposed waste enclosures.

IMC 18.07.480(E)(11) CONCLUSION: Waste and recycling receptacles for each building meeting the operational needs of Recology have been provided. The project complies with this requirement.

12. IMC 18.07.480(E)(12): PARKING

SECTION SUMMARY:
The Applicant is proposing to share parking between daytime school uses and event parking because events will occur after school hours and the parking demand will not overlap. The proposal requires an AAS to share parking and has demonstrated compliance with applicable approval criteria. The Applicant has located parking appropriately and provided adequate bicycle parking. The proposal will comply with applicable parking requirements.

The project is required to provide adequate on-site parking pursuant to IMC 18.07.480(E)(12). Chapter 18.09 IMC establishes minimum off-street parking standards.

a. IMC 18.09.050: Off-Street Parking Spaces Required

High School

According to IMC 18.09.050, high schools are required to have four spaces per classroom plus one space per employee or faculty member, or one space per three seats in an auditorium, whichever is greater. Calculating by classroom and staff results in the greatest number[32] of off-street parking spaces required, resulting in 421 off-street parking spaces:

Classrooms: *Staff/Faculty:*

$$74 \text{ classrooms} * \frac{4 \text{ spaces}}{1 \text{ classroom}} = 296 \text{ spaces} \quad + \quad 125 \text{ staff} * \frac{1 \text{ space}}{1 \text{ staff}} = 125 \text{ spaces}$$

296 spaces + 125 spaces= **421 spaces**

Elementary School

According to IMC 18.09.050, elementary schools are required to have three spaces per classroom or one space per three seats in an auditorium, whichever is greater. Calculating by auditorium seats results in the greatest number[33] of off-street parking spaces required, resulting in 117 spaces:

[32] The high school will include a 500-seat auditorium, resulting in 167 off-street parking spaces. This is less than the 421 off-street parking spaces when calculated by classrooms and staff/faculty.
[33] The elementary school will include 32 classrooms in the main building and portables, resulting in 96 off-street parking spaces. This is less than the 117 off-street parking spaces when calculated by auditorium seating.

$$350 \text{ seats} * \frac{1 \text{ space}}{3 \text{ seats}} = \textbf{117 spaces}$$

Stadium

According to IMC 18.09.050, the stadium is required to provide one space per three seats.[34] The proposed stadium includes 2,000 seats and requires 667 spaces:

$$2{,}000 \text{ seats} * \frac{1 \text{ space}}{3 \text{ seats}} = \textbf{667 spaces}$$

Per IMC 18.09.030, the Applicant would typically be required to provide parking for all three uses (total 1,205 parking spaces) to meet off-street parking requirements. The Applicant is proposing to share all on-site parking to meet the parking requirements for after-school events and will provide a total of 667 off-street parking spaces in a combination of structured and surface parking areas.

CONCLUSION: An AAS is required to authorize shared parking for special events. The daytime parking requirements for both schools (total of 538 off-street parking stalls) has been provided and no adjustment is needed for these uses.

b. AAS21-00002, Modification to IMC 18.09.050, Shared Parking and Parking Reduction Adjustment

Administrative adjustments to parking standards are governed by IMC 18.09.060. Pursuant to IMC 18.09.060(D), the purpose of an AAS for required parking spaces is to provide flexibility to those uses which may be extraordinary, unique, or to provide flexibility to a combination of uses which makes the parking spaces appear inappropriate. The Applicant submitted an AAS (**Permit no. AAS21-00002**) to authorize shared parking between daytime school uses and special events uses. The Applicant has indicated that the stadium will be at full capacity only five days per year and these full-capacity events will occur after school hours only (Attachment 28 – Parking AAS Narrative). ISD has committed to ensuring events at the stadium and at the elementary school auditorium are scheduled on different dates. **[CONDITION 15]** Given the timing and use of the stadium, requiring the full amount of off-street parking for both schools and the stadium appears excessive, and the project is eligible for an AAS.

The following are the approval criteria in IMC 18.09.060(D) and (E):

a. Documentation: The applicant shall document that the individual project will require the amount of parking which is different from that required under the

[34] Eighteen inches of a bench or bleacher is considered one seat per Table 18.09.050.

parking standards. Documentation may include the parking requirements and performance of similar uses in other areas, or other related information.
Staff Analysis: The Applicant provided a parking analysis in the traffic study (Attachment 60, Section 4.7 – Transportation Technical Report) estimating typical school day parking demand of 644 vehicles[35] and evaluating event parking demand.[36] According to the analysis, the elementary school auditorium will have event parking demand of up to 330 spaces and the high school stadium will have typical event parking demand of up to 600 spaces, with the notable exception of Curriculum Night, an annual event that may require more than 1,000 parking spaces. Except for this single event, parking demand will be lower than the required number of parking spaces. ISD will provide a special event parking management plan including the use of paved areas around the site as temporary event parking[37] and provisions for off-site parking and shuttling service adequate to address this event. **[CONDITION 16]** High school and elementary school events will not occur on the same dates **(Condition 15)**. The Applicant has provided adequate documentation to show the amount of parking needed is less than the amount of parking required. The proposal complies with this criterion.

b. *Function and Use of Site: The applicant shall demonstrate that modifying the amount of required parking spaces will not negatively impact the use or function of the site and/or adjacent sites.*
Staff Analysis: The Applicant has documented that parking demand for school hours and parking demand for after-school events will not overlap (Attachment 28 – Parking AAS Narrative), will provide temporary on-site event parking, and will establish a special event parking management plan consistent with recommendations in the Transportation Technical Report (Attachment 60 – Transportation Technical Report) **(Conditions 15 and 16)**. Reducing the amount of required parking spaces minimizes the amount of clearing, grading, and new impervious surface by eliminating surface parking lots and parking structures that would otherwise be needed to accommodate the 1,205 parking spaces that could be required under the IMC, while ensuring adequate parking will be available for different periods of the day (e.g. school hours versus after school). Given that approximately half of this parking would be vacant during school hours and approximately half of this parking would be vacant during after-school events, a shared approach to parking is appropriate and will not negatively impact the use or function of the site and/or adjacent sites. As conditioned, the proposal complies with this criterion.

---

[35] This exceeds off-street parking requirements and is based on performance of other elementary schools and high schools in the vicinity. Any future revisions should consider this the minimum amount of required off-street parking.
[36] According to the Applicant, parking demand for daytime school uses and after-school events will not overlap.
[37] The Applicant estimates an additional 91 temporary spaces can be provided in bus loading and bus parking areas, student drop-off areas, loading zones, and other paved areas of the site.

c. *Intent: The applicant shall demonstrate that the adjustment of the standards will be equal to, or superior in, fulfilling the intent and purpose of the original requirements.*
Staff Analysis: IMC 18.09.030(A) indicates the purpose and intent of required parking spaces are to provide an adequate amount of vehicle parking for a specific use, recognizing that a balance must be achieved between inadequate and excessive parking. The project includes an adequate number of off-street parking spaces by providing 667 spaces, the maximum number of spaces needed for the most parking-intensive use on the site (the stadium), which is more than enough to accommodate daytime school uses because parking demand for daytime use and after-hours events will not overlap. The Applicant is also providing adequate special event parking, including both on-site and off-site parking plans **(Conditions 15 and 16)**. This approach provides adequate off-street parking without providing excessive parking that wastes space and requires additional impervious surface and parking structure bulk. The proposal complies with this criterion.

d. *Numbers of Employees/Customers: The applicant shall establish: (1) An on-site transportation management program for uses with fifteen (15) or more employees; (2) Valet parking or shuttle service, where appropriate; and (3) The applicant shall demonstrate that the number of employees/customers is lower or higher than the established "industry standard" based on comparative information of similar uses in other areas.*
Staff Analysis: The Applicant has indicated 225 staff and faculty will be needed for the schools and is required to provide an on-site transportation management program. The employee count is determined based on programmatic requirements and there is no "industry standard" for comparison. The traffic study indicates that ISD will develop a Transportation Management Plan (TMP) to encourage travel by modes other than single-occupant vehicles (Attachment 60 – Transportation Technical Report). The TMP is required as a condition of approval. **[CONDITON 17]**

The Applicant will prepare a special event parking management plan **(Condition 16)**, including providing shuttle service if necessary for extremely large events but has not identified any events that will require shuttle service. The Applicant is required to provide a School Event Management Plan as a condition of approval **(Condition 16)** that will include shuttle service if needed in the future. As conditioned, the proposal complies with this criterion.

e. *Tree Retention: The applicant shall demonstrate that the adjustment allows for the retention of existing significant trees. Significant trees retained through this*

provision shall be considered protected trees and not able to be removed without replacement.
Staff Analysis: According to the Applicant, the proposed parking quantity and layout reduces the overall footprint of the site and allows retention of additional significant trees (Attachment 28 – Parking AAS Narrative). Reducing the number of required parking spaces reduces the total amount of surface parking lots and/or parking structure mass to be built while ensuring the site will be safe and functional. Less parking requires less land area, thus allowing retention of more existing mature vegetation on the site including the substantial vegetated buffer and significant trees around the perimeter of the property. The retained trees in the buffer area will be protected through an easement or similar instrument recorded against the property **(Condition 7)**. As conditioned, the proposal complies with this criterion.

f. Prime Hours of Operation: Majority of employees arrive and leave site at nonpeak hours for parking lot usage, and can stagger the use of the parking lot.
Staff Analysis: The Applicant has provided adequate documentation to demonstrate that parking demand for daytime school use and for after-school events utilizing the stadium will not overlap and that parking usage can be effectively staggered. The Applicant is required to provide a School Event Management Plan as a condition of approval **(Condition 16)** that will ensure event parking is well-managed. As conditioned, the proposal complies with this criterion.

g. Shuttle: Majority of customers arrive at one time and valet parking or shuttle service is used.
Staff Analysis: The Applicant has indicated that off-site parking will not be needed in the foreseeable future. In the future, should off-site parking become necessary, the applicant will provide shuttle service from an ISD-owned property in the vicinity **(Condition 16)**. A shuttle or valet service will not typically be needed for this project as proposed, but ISD is required to prepare a special event parking management plan that provides for off-site parking and shuttle service if parking demand could exceed available permanent and temporary supply **(Conditions 15 and 16)**. As conditioned, the proposal complies with this criterion.

AAS21-00002, Shared Parking and Parking Reduction Adjustment: COMPLIES. Based on the foregoing analysis, the Applicant's request (**Permit no. AAS21-00002**) **COMPLIES** with the review criteria in IMC 18.09.060(D) and (E) for reducing parking requirements and sharing parking between daytime school uses and special events.

CONCLUSION: Upon approval of the AAS request, the proposal will provide adequate on-site parking consistent with Chapter 18.09 IMC.

c. IMC 18.09.030(F)(3) Location of Parking

IMC 18.09.030(F)(3) requires parking for nonresidential uses to be provided within 800 feet of the building or use for which the parking is required. Parking is located no greater than 242 feet from the elementary school (surface parking lots to the north and east) and no greater than 543 feet from the high school (parking garage and surface parking lots to the north). Accessible parking is located in surface parking lots throughout the site and in the parking garage. See Section VII.A.16 of this Staff Report for information on structured parking requirements.

CONCLUSION: The project is consistent with parking location and structured parking requirements.

d. IMC 18.09.030(I) Bicycle Parking

All sites required to provide nonmotorized facilities are also required to provide bicycle parking spaces pursuant to IMC 18.09.030(I). Required bicycle parking is calculated at five percent of required automobile parking spaces for the first 300 auto stalls and one percent of auto stalls after the first 300. If the requested AAS, for shared parking and parking reduction, (Permit no. AAS21-00002) is approved, the project will require 667 automobile spaces and must, therefore, provide 19 bicycle parking stalls:

(5% * 300) + (1% * 367) = 18.67, rounded up to **19 bicycle stalls**

The Applicant is proposing to include 15 bicycle racks on the north side of the high school, 15 bicycle racks on the south side of the high school, and five bicycle racks on the north side of the elementary school (Attachment 97, Sheet C2.0 – Civil Plans). The site amenities detail sheet indicates the bicycle racks will have capacity for two bicycles each (Attachment 99, Sheet L1.10LU, Image 09 – Site Amenities Sheet), for a total estimated bicycle parking capacity of 60 bicycles at the high school and 10 bicycles at the elementary school. Bicycle parking is shown in a visible, public location within 50 feet of a primary building entrance and does not block pedestrian use of any walkways (Attachment 97, Sheet C2.0 – Civil Plans).

CONCLUSION: The project complies with all applicable bicycle parking requirements.

IMC 18.07.480(E)(11) CONCLUSION: As conditioned and upon approval of the AAS to share parking, the project will comply with applicable parking requirements.

13. IMC 18.07.480(E)(12): TRAFFIC

SECTION SUMMARY:
The Applicant provided a traffic study identifying mitigation necessary for project-related impacts on traffic in the vicinity. Mitigations include various transportation management plans, capacity improvements on 228th Avenue SE and SE 43rd Way, signalization of the entry boulevard, and payment of transportation impact fees.

Pursuant to IMC 18.07.480(E)(12), the project is also required to identify impacts of the facility on neighborhood traffic and provide mitigation. The Applicant provided the following documents analyzing traffic impacts and mitigation:

- Transportation Technical Report dated September 1, 2020 (Attachment 60)
- Trip Generation and Distribution – Updated Technical Memorandum dated June 9, 2020 (Attachment 65)[38]
- Site Access Analysis Technical Memorandum dated June 10, 2020 (Attachment 64)[39]
- Potential Neighborhood Traffic Calming Measures Technical Memorandum dated May 10, 2021 (Attachment 63)[40]
- Updated Traffic Analysis for 228th Avenue SE Near Site Technical Memorandum dated May 18, 2021 (Attachment 62)[41]
- Traffic Analysis Supplement dated April 26, 2021 (Attachment 66)[42]

All studies and memoranda were prepared by Heffron Transportation, Inc. According to the Transportation Technical Report (traffic study), the schools will generate a total of 1,303 vehicle trips in the morning peak hour, 862 vehicle trips in the afternoon peak hour, and 476 vehicle trips in the commuter PM peak hour (see Figure 14, on the following page) (Attachment 60, Executive Summary page 1 – Transportation Technical Report).[43]

---

[38] This memorandum summarizes updates to initial trip generation and distribution estimates from the original Transportation Technical Report. Information in this memorandum was incorporated into the September Transportation Technical Report. No further analysis of this memorandum is included in the Staff Report.
[39] This memorandum evaluates a single site access driveway and sufficiency to accommodate projected future peak traffic volumes. Information in this memorandum was incorporated into the Transportation Technical Report. No further analysis of this memorandum is included in the Staff Report.
[40] This memorandum addresses traffic calming measures to address cut-through traffic in City of Sammamish neighborhoods. No further analysis of this memorandum is included in the Staff Report as this is outside of the City's jurisdiction.
[41] This memorandum recommends changes and updates to traffic operating characteristics in the traffic model and provides recommended updates to the capacity improvement recommendations at SE 40th Street/228th Avenue SE. This intersection is within the City of Sammamish and any traffic impacts and mitigations must be reviewed and approved by that jurisdiction. No further analysis of this memorandum is included in the Staff Report.
[42] This memorandum is specific to cut-through traffic in the City of Sammamish. No further analysis of this memorandum is included in the Staff Report.
[43] Estimated trip generation assumes the proposed schools will have similar characteristics compared to other ISD schools.

Analysis Period	High School #4 Trip Generation			Elementary #17 Trip Generation			Total Trip Generation for Both Schools		
	Inbound	Outbound	Total	Inbound	Outbound	Total	Inbound	Outbound	Total
AM Peak Hour (7:15 to 8:15 AM)									
Trips	767	344	1,111	133	59	192	900	403	1,303
Peak Hour Factor [a]	0.58	0.56	0.58	0.42	0.31	0.38	0.63	0.63	0.63
Afternoon Peak Hour (3:00 to 4:00 PM)									
Trips	127	489	616	131	115	246	258	604	862
Peak Hour Factor	0.76	0.56	0.59	0.62	0.35	0.60	0.77	0.69	0.75
Commuter PM Peak Hour (4:45 to 5:45 PM)									
Trips	147	181	328	68	80	148	215	261	476
Peak Hour Factor	0.78	0.74	0.76	0.77	0.77	0.77	0.87	0.87	0.87

Source: Heffron Transportation, April 2020.

a. PHF = Peak Hour Factor = Peak Hour Volume / (4 X Peak 15-minute Volume)

Figure 14: Cumulative Trips Generation for Analysis Peak Hours. Source: Transportation Technical Report prepared by Heffron Transportation Inc., dated February 16, 2020 (Attachment 60).

The traffic study analyzed 23 intersections in the Cities of Issaquah and Sammamish and evaluated three analysis periods (morning peak hour between 7:00 and 8:00AM, afternoon peak hour between 3:00PM and 4:00PM, and commuter peak hour between 4:45PM and 5:45PM).

The traffic study concluded that after construction of proposed improvements (Attachment 60, Executive Summary pages 1-2 – Transportation Technical Report):

- The new entry drive intersection with 228th Avenue SE will operate at a level of service (LOS) C or D during the morning peak hour, LOS B during the afternoon peak hour, and LOS A during the commuter PM peak hour.
- The SE 40th Street/228th Avenue SE intersection, which is projected to operate at LOS F in 2024 without the project, would improve to LOS D or better during peak hours with the proposed new intersection at the entry drive.
- Delays to the NW Sammamish Road/17th Avenue West intersection will be mitigated by payment of traffic impact fees to City of Issaquah.
- The SE 43rd Way/East Lake Sammamish Parkway intersection will operate at LOS E during morning peak hours. Because the projected delay is less than 0.5 second above the LOS D threshold, the cumulative conditions are substantially higher than the rate reflected in the City of Issaquah's traffic models, and the City has chosen to implement a separate capacity reduction at this location, no mitigation is recommended.

The proposed traffic signal at the entry drive will address traffic operational and queueing needs. The traffic study recommends that ISD work with the City of Sammamish to implement a school zone speed limit on 228th Avenue SE adjacent to and

approaching the site to improve safety conditions for vehicles and pedestrians in the vicinity of the school site.

Based on the analysis and recommendations in the traffic study, the project includes: (1) widening and improving SE 228th Avenue SE, (2) constructing pedestrian improvements along 228th Avenue SE, and (3) signalizing the entry drive intersection at 228th Avenue SE and constructing a southbound right-turn lane and northbound double-left-turn lanes at the intersection approaches. The project also includes or is conditioned to require the following mitigation measures recommended by the traffic study (Attachment 60 – Transportation Technical Report):

1. Capacity improvement at the SE 40th Street/228th Avenue SE intersection (to be determined in coordination with the City of Sammamish)
2. Establishing a school zone speed limit on 228th Avenue SE
3. Preparation of a Construction Management Transportation Plan (CMTP) **(Condition 19)**
4. Preparation of Transportation Management Plans (TMPs) **(Condition 17)**
5. Preparation of a School Event Management Plan (SEMP) for evening events with more than 1,000 expected attendees **(Condition 16)**
6. Payment of City of Issaquah Transportation Impact Fees.

The traffic study was reviewed by the City of Issaquah's third-party traffic consultant and determined to be in conformance with City of Issaquah requirements for traffic studies and best practices. The Applicant is required to incorporate the recommended project design and mitigation measures into the proposal (CMTP, TMP, SEMP) and pay all required transportation impact fees. **[CONDITION 18] [CONDITION 19]**

IMC 18.07.480(E)(13) CONCLUSION: The Applicant has provided adequate information to determine potential traffic impacts and, as conditioned, will incorporate all required or necessary design and mitigation measures. As conditioned, the proposal complies with this requirement.

14. IMC 18.07.480(E)(14): LANDSCAPING

SECTION SUMMARY:

The proposal meets applicable landscaping requirements for circulation facilities (roads and nonmotorized pathways), parking areas, critical areas, fencing, walls, and waste enclosures.

The proposal will remove a significant number of trees, causing the property to fall below density requirements and triggering replanting. The proposal requires an AAS to reduce the minimum tree retention requirement and has demonstrated compliance with review criteria. The Applicant will exceed minimum replanting requirements and will comply with applicable size and quality requirements for replacement trees.

Pursuant to IMC 18.07.480(E)(14), the Central Issaquah Development and Design Standards (CIDDS) Chapter 10.0 *Landscape* applies to the project in lieu of the landscaping standards in IMC Chapter 18.12. The intent of CIDDS Chapter 10.0 is to draw nature into an urban area and add green elements to soften the urban form. In compliance with CIDDS 10.3, the Applicant submitted landscape plans to demonstrate consistency with the requirements in CIDDS Chapter 10.0 (Attachment 99 – Landscape Plans). The landscape plans are required to show all surficial or above-grade equipment, utilities, or appurtenances and any changes to them require a revision to be reviewed and approved by the CPD Director.

a. CIDDS 10.4 Circulation Elements and Community Space

CIDDS 10.4 establishes landscaping requirements for circulation facilities[44] and for community space.[45] The Applicant is proposing street trees planted 30 feet on center in minimum five-foot-wide planting strips along the exterior edges of the internal road network (Attachment 99, Sheet L2.0LU – Landscape Plans). Trees are proposed to be Eddie's White Wonder dogwoods that are a minimum of two-inch caliper at the time of planting; Eddie's White Wonder is Issaquah's Centennial Tree intended to be used as a single specimen tree or in small groupings, per CIDDS 10.17.A and the City strongly discourages the use of Eddie's White Wonder as a street tree. The Applicant is also proposing extensive landscaping around the campus, including a mix of trees, shrubs, vines, and ground covers. To ensure the health of the plants during the establishment period, the Applicant is required to provide irrigation for a minimum of three years, and irrigation will be reviewed with the Landscape Permit for the proposal.

CONCLUSION: The proposal complies with applicable Street Tree requirements in CIDDS 10.4.A.

b. CIDDS 10.5.A Landscape and Decorative Requirements for Parking Areas – Surface Parking

CIDDS 10.5.A regulates landscape areas in surface parking lots. The Applicant has provided a landscape diagram for each parking area showing the parking area, interior landscape area, edge landscape area, and parking lot trees. All proposed surface parking areas exceed 2,300 square feet in size and do not qualify for the *Small Parking Lots* landscaping options; the Applicant is not proposing to use *Alternatives to Parking Lot Landscaping* in CIDDS 10.5.A.4. Therefore CIDDS 10.5.A.3 and CIDDS 10.5.A.4 apply.

---

[44] Per CIDDS 2.2, **Circulation Facilities** means: "Circulation encompasses all public and private facilities necessary for motorized and nonmotorized movement, including pedestrian, bicycles and vehicles.

[45] Per CIDDS 2.2, **Community Space** means: "The umbrella term designated for lands containing resource protection, recreation or public amenity such as active or passive parks, plazas, trails, informal gathering areas, community gardens, and other like facilities and areas…."

Surface parking lots are required to have interior parking lot landscaping equivalent to at least 10 percent of the parking lot area, and interior parking lot landscaping is required to include one tree for every six parking stalls. Landscape islands must be provided at the end of parking aisles. Interior landscape islands with trees must be a minimum of five feet wide curb-to-curb. Surface parking lots abutting circulation facilities are also required to provide edge landscaping consisting of an evergreen hedge in a planting bed at least three feet wide. All landscaping must be spaced to achieve 100 percent coverage within three years.

The Applicant is proposing parking lot interior and edge landscaping consistent with these requirements, as summarized in Tables 7 and 8, below, and shown on the landscape plans (Attachment 99, Sheets L2.3LU, L2.4LU, L2.5LU, and L2.7LU – Landscape Plans).

Table 7: Summary of High School and Bus Surface Parking Lot Interior and Edge Landscaping Compliance

	Required	**Proposed**			
Parking Lot		**North**	**West**	**Head-In**	**Bus Area**
Parking Area		14,597 sq.ft.	6,385 sq.ft.	3,115 sq.ft.	60,476 sq.ft.
Parking Stalls		45	6	14	52
Trees	1 per 6 stalls	9	2	3	13
Interior Landscape Area	10% of Parking Area	11% 1,566 sq.ft.	17% 1,059 sq.ft.	17% 526 sq.ft.	21% 12,848 sq.ft.
End of Aisle	Required	Yes	Yes	Yes	Yes
Min. Width	3ft.	5ft.	5ft.	5ft.	5ft.
Complies	Yes	Yes	Yes	Yes	Yes

Table 8: Summary of Elementary School Surface Parking Lot Interior and Edge Landscaping Compliance

	Required	**Proposed**		
Parking Lot		**North**	**West**	**Head-In**
Parking Area		8,001 sq.ft.	5,721 sq.ft.	10,907 sq.ft.
Parking Stalls		20	18	58
Trees	1 per 6 stalls	6	3	10
Interior Landscape Area	10% of Parking Area	15% 1,197 sq.ft.	10% 587 sq.ft.	19% 2,089 sq.ft.
End of Aisle	Required	Yes	Yes	Yes
Min. Width	3ft.	5ft.	5ft.	5ft.
Complies	Yes	Yes	Yes	Yes

In addition to compliance with the dimensional requirements for interior and edge landscaping, the Applicant has provided a planting schedule requiring plants to be provided at specific sizes (Attachment 99, Sheet L2.0.ALU – Landscape Plans). The

specifications for plant sizes and quantities are anticipated to result in 100 percent landscape coverage within three years of planting. Proposed plants generally meet minimum size requirements and maximum spacing requirements in CIDDS 10.17.F; minor modifications to the plant list are required. **[CONDITION 20]**

The Applicant did not provide edge landscaping between the bus parking area and the high school building, due to the need to provide safe sightlines and ample circulation (Attachment 99, Sheet L2.7LU – Landscape Plans). Ample landscaping, including a substantial undisturbed vegetated buffer, is shown on the plans between the bus parking area and the adjacent property. The bus parking area is not adjacent to circulation facilities or community spaces on its north side and edge landscaping at this location is not required pursuant to CIDDS 10.5.A.3.

CONCLUSION: The proposal complies with applicable surface parking lot landscape requirements.

c. CIDDS 10.5.B Landscape and Decorative Requirements for Parking Areas – Parking Structure.

CIDDS 10.5.B regulates landscape areas in, around, and on parking structures. The Applicant has provided a landscape diagram for the parking structure showing the parking area, interior architectural elements, edge landscape area, green screens, and perimeter architectural elements, shown in Figures 15-17 on pages 78, 79, and 81 of this Staff Report.

Parking structures are required to include perimeter landscaping and rooftop landscaping with both interior and perimeter components. The parking structure is partially below grade at the southern end (the top level is at-grade with the road and pedestrian plaza to the south), as shown in Figure 15, on the following page. The Applicant is proposing a perimeter treatment meeting the requirements in CIDDS 10.5.B.1.d, including green walls mounted to the structure at the northeast corner (see Figure 15 top and center) and a minimum 10-foot-wide landscape area around the remaining portions of the structure, except where exempt for pedestrian and vehicular ingress and egress, shown in Figure 16 on page 79. The proposal complies with perimeter treatment requirements.

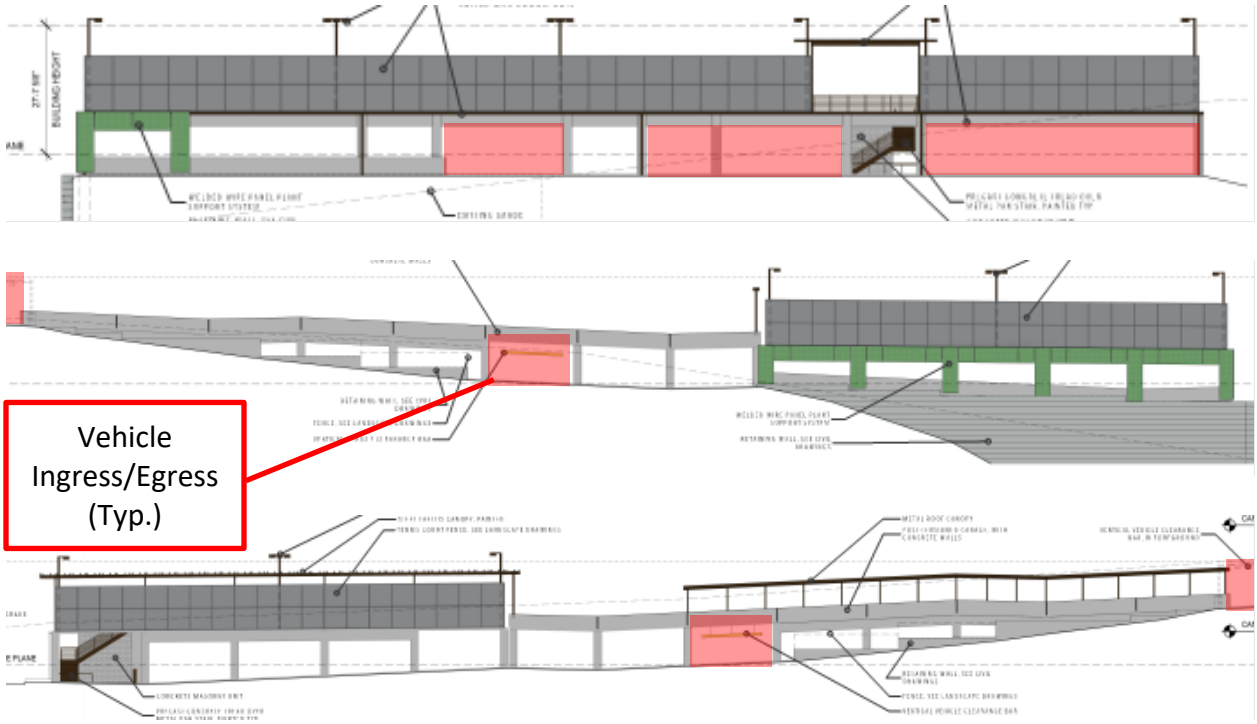


Figure 15: Parking Structure Elevations (excl. perimeter landscaping). Top: North Elevation. Center: East Elevation. Bottom: West Elevation. Annotations by Staff. Source: ISD (Attachment 98 – Architectural Plans & Building Elevations).

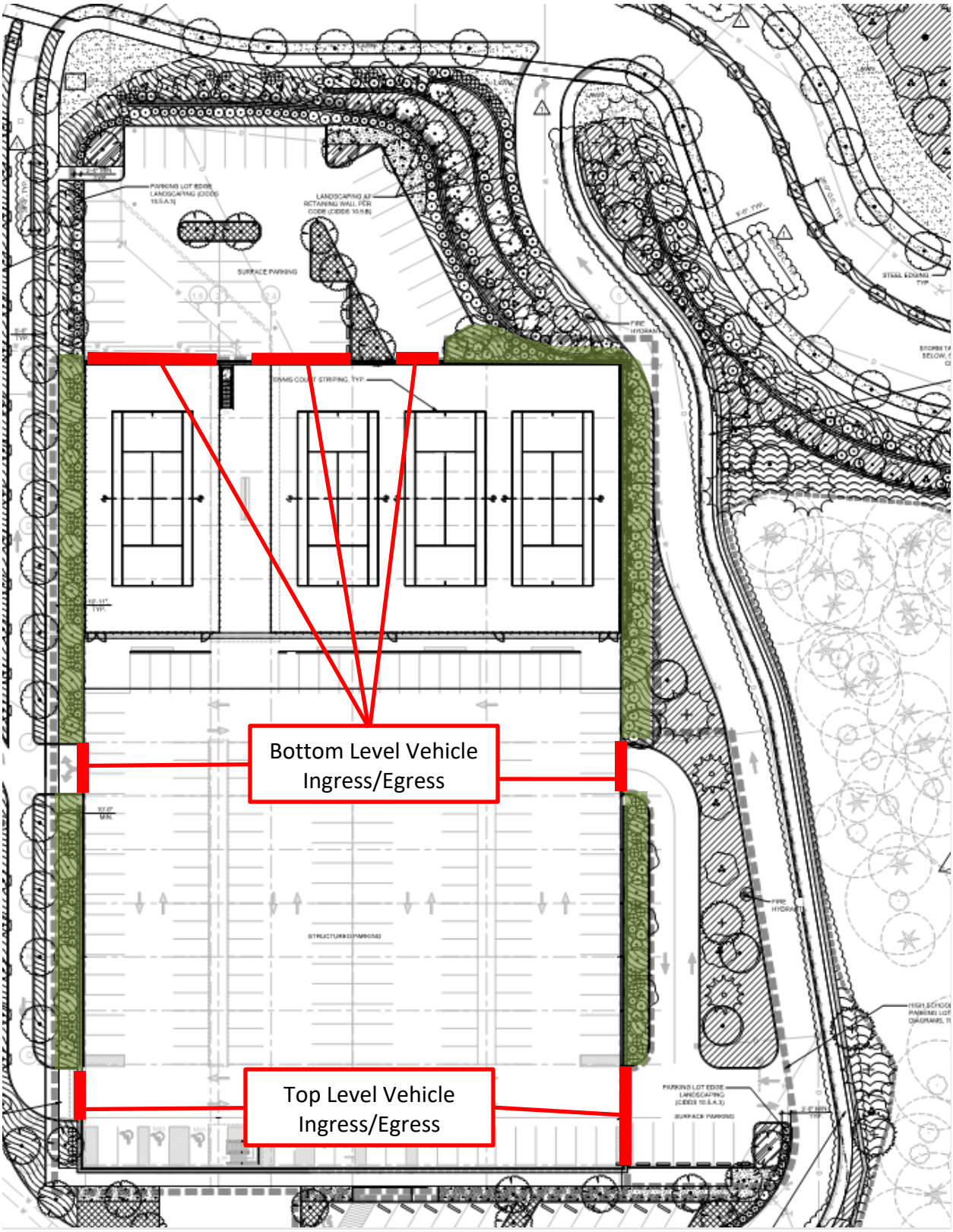


Figure 16: Parking Structure Edge Landscaping & Exempt Areas.
Annotations by Staff. Source: ISD (Attachment 99 – Landscape Plans).

In addition, the Applicant is proposing rooftop treatments meeting the requirements of CIDDS 10.5.B.2.a.1-2 by providing an architectural cover over the pedestrian walkway, shown in Figure 17, on the following page. The parking structure is 57,227 square feet in size and requires an architectural component at least equal to 10 percent of the parking area, or 5,723 square feet. The proposed covered walkway will be 5,832 square feet in size, which exceeds the minimum requirement. When using architectural elements, the Applicant must demonstrate that they meet the intent of rooftop landscaping requirements to soften the visual appearance of the rooftop, screen views of the rooftop, add shade, break up the visual appearance of rooftop parking, and reinforce safe pedestrian access to stairwells and elevators. The proposed pedestrian cover, including the portion extending northward between the tennis courts to overlook the surface parking lot and campus areas below, meet the intent of rooftop landscaping requirements by providing visual interest, adding shade, breaking up the appearance of the parking areas, and reinforcing safe pedestrian access to stairs on the north side. The Applicant has indicated that a rooftop perimeter architectural element is proposed for visual screening, which must be at least 3 feet in height per CIDDS 10.5.B.2.b.1 (Attachment 99, Sheet L2.5LU – Landscape Plans) but the materials lack adequate information for review. The Applicant will be required to provide an architectural element detail for review and approval by the Community Planning and Development Director or her designee with construction permits for the parking structure. **[CONDITON 21]**

CONCLUSION: As conditioned, the project complies with applicable parking structure perimeter and rooftop landscape requirements.

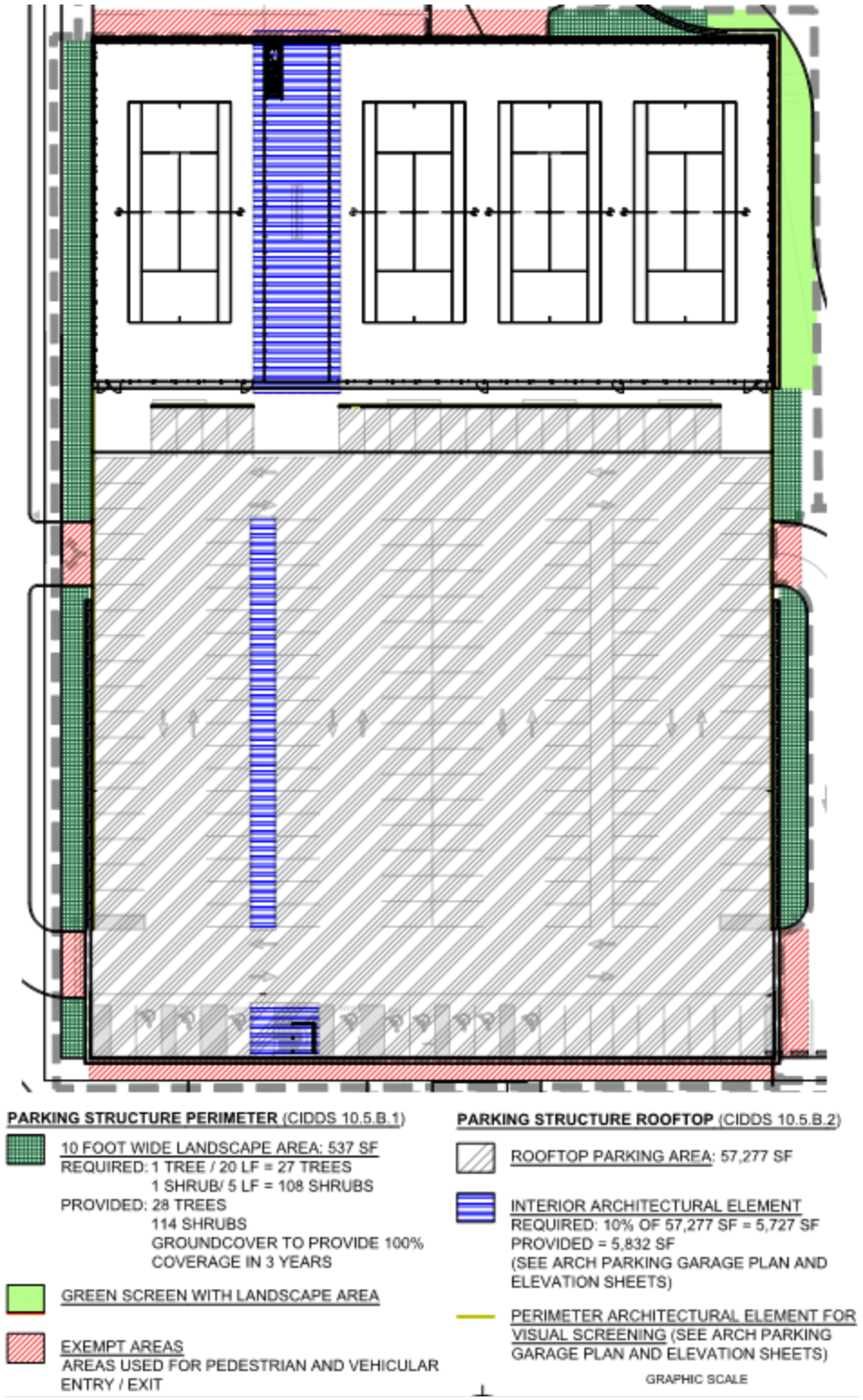


Figure 17: Parking Structure Code Compliance Diagram. Source: ISD (Attachment 99, Sheet L2.5LU – Landscape Plans).

d. CIDDS 10.7 Plant Material Adjacent to Critical Areas

CIDDS 10.7 encourages the retention of native vegetation adjacent to critical areas and their buffers. Wetlands present on the property are discussed in further detail in Section VII.B.2 of this Staff Report. The Applicant is proposing to protect and leave undisturbed Wetland B and a 50-foot buffer of existing vegetation around the wetland. No plant materials whose seeding methods or growth patterns are likely to result in migration into critical areas and their buffers are proposed, as shown in Figure 18, below; proposed plants are native species. These requirements do not apply to Wetland C because it will be filled as part of the proposal (see Section VII.B.2 of this Staff Report for additional information).

These requirements do not apply to the steep slope areas because, due to their size and inclination, they are exempt from buffer requirements in the IMC (see Section VII.B.1 of this Staff Report for additional information). These requirements do not apply to seismic hazard areas, erosion hazard areas, or critical aquifer recharge areas (CARAs) because these critical areas do not have buffers (see Section VII.B.1 and VII.B.3 of this Staff Report for additional information).

CONCLUSION: The proposal complies requirements for planting near critical areas.

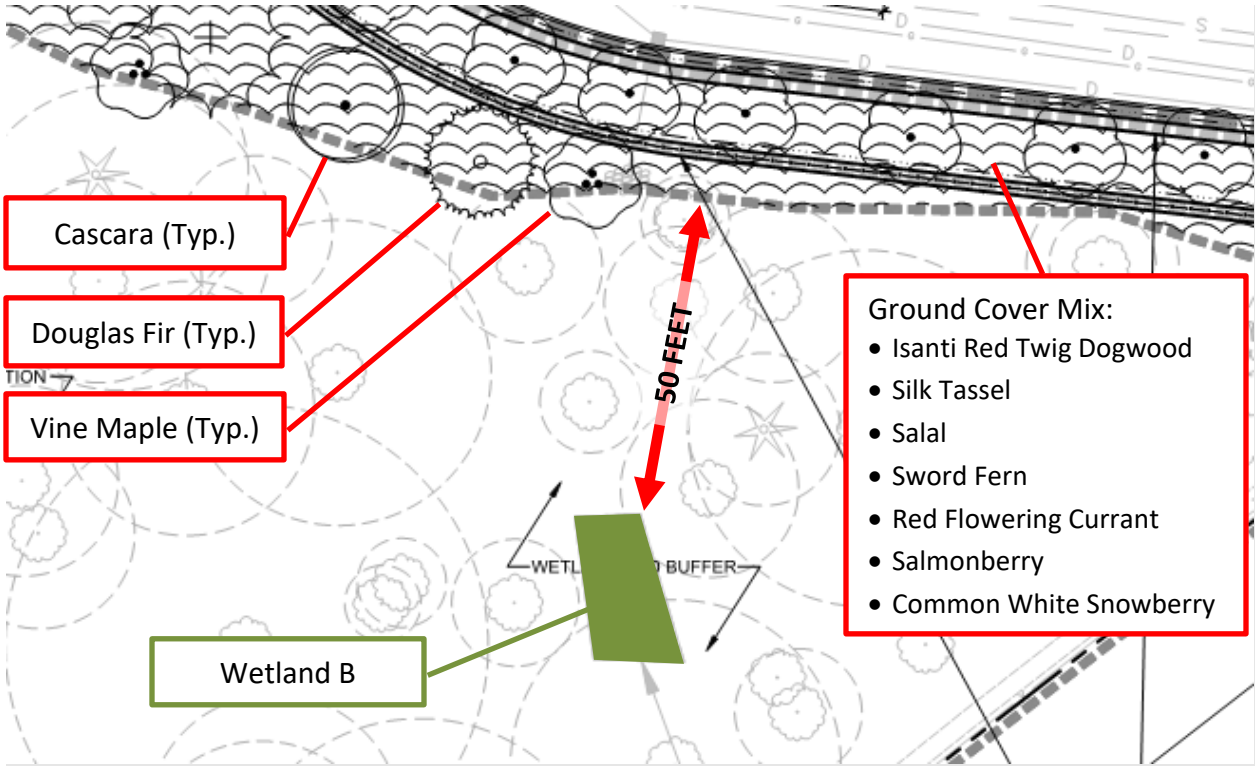


Figure 18: Planting near Wetland B. Annotations by Staff. Source: ISD (Attachment 99 – Landscape Plans).

e. CIDDS 10.8.A Landscape Requirements for Fences

Fencing in landscape areas is subject to the requirements in CIDDS 10.8 and, per CIDDS 10.8.A, the additional fencing requirements in CIDDS Chapter 16.0 *Landscape*. CIDDS Chapter 16.0 also references the fencing requirements in IMC 18.07.120.

Fencing requirements in CIDDS 10.8.A require that, when fencing is installed on the property line, planting is required to be on the side of the fence with the greatest public use and adherence to the guidelines in CIDDS 16.3. The guidelines require the following:

1. Fence design should complement the character of the development.
2. Fence heights should be based on the nature of adjacent facilities.
3. Fences should avoid creating a canyon effect, especially adjacent to pedestrian ways.
4. The fence style or articulation of long expanses of fences should provide visual relief and reduce the bulk and size of the fence, or landscaping should be used to add interest.
5. Where large fences are used to screen undesirable elements, then articulation, artwork, and/or landscaping should be used to soften the visual effect of the structure. Full height fences (6-8 feet) should be used to screen unsightly facilities such as waste collection areas.
6. Wood, brick, stucco, or wrought iron are preferred fencing materials when visible to the public or abutting property owners.
7. Chain link fencing (with or without infill slats) should not be used in visually prominent areas. In less prominent areas, black vinyl coated fencing may be used. Chain link fencing should be softened with landscaping.
8. Fences shall comply with IMC 18.07.120.

The Applicant has indicated fencing will be installed around the perimeter of its facilities but not on the property line, except that fencing will be provided at the top of the retaining walls along 228th Avenue SE. The Applicant provided a fencing diagram to demonstrate compliance with applicable fence requirements (Attachment 99, Sheet L1.8LU – Landscape Plans). The Applicant is proposing a range of fencing heights and types, including (Attachment 99, Sheet L1.8LU – Landscape Plans):

- 4-foot-high black vinyl coated chain link fence.
- 4-foot-high ornamental fence.
- 6-foot-high black vinyl coated chain link fence, with and without netting.
- 8-foot-high black vinyl coated chain link fence, with and without netting and windscreen.
- 8-foot-high black vinyl coated chain link fence and perforated metal wall panel.
- 8-foot-high ornamental fence.
- 12-foot-high black vinyl coated chain link fence with and without windscreen.
- 25-foot-high black vinyl coated chain link backstop.

- 32-foot-high black vinyl coated chain link backstop.
- Sports netting.

The proposed fencing design complements the character of a school development project. The Applicant has provided ornamental fencing in visually prominent areas where chain link is not required for safety (see discussion of fencing materials, below); black vinyl coated chain link is provided around athletic facilities and on top of retaining walls and other structures for fall protection. The proposed fencing avoids creating a canyon effect by using fence types with high visual transparency between vertical and horizonal members and the use of chain link mesh, and by designing fencing so it is separated horizontally and/or vertically. The fencing design is consistent with the guidelines in CIDDS 16.3.A-C.

Long expanses of fencing are limited to the fencing along 228th Avenue SE south of the main entry drive and the elementary school fencing on the west side of the playground. Articulation is not possible in these locations due to the facility design. The elementary school fencing is located such that it will be screened by existing, mature landscaping in the vegetated buffer. The fencing along the upper retaining wall along 228th Avenue SE will blend visually into the background of existing, mature vegetation. The fencing along the lower retaining wall will have a limited amount of landscaping behind it that will add visual interest. The fencing, located on the property line, complies with CIDDS 10.8.A and the guidelines in CIDDS 16.3.D.

The proposed ornamental fencing detail provided by the Applicant is a wrought iron fence consistent with the preferred materials in CIDDS 16.3.F. The proposed chain link fencing is black vinyl coated. The Applicant has indicated that chain link fencing is necessary for safety, including both fall protection and at athletic facilities where the flexibility of fencing is needed to stop a ball or a person running into/hitting the fence. The City has accepted the necessity of using black vinyl coated chain link fencing and sports netting to support the safety of students and other users at athletic facilities on the school campus. Where fencing is required, it must be ornamental if located in a visually prominent area that does not otherwise require chain link fencing for safety. In all other locations, black vinyl coated chain link fencing is allowed. If the City does not require fencing and the Applicant chooses to install it based on their own evaluation of safety or other reasons, the fence design/material must comply with the location-based requirements described above. **[CONDITON 22]**

Per CIDDS 10.8.A, the proposed fencing must also comply with the requirements for fences in IMC 18.07.120, which covers Accessory structures – Fences, arbors, pergolas and trellises. IMC 18.07.120(A)(1) establishes height requirements in commercial and residential zoning districts; because the property is zoned CF-F, however, this section does not apply. IMC 18.07.120(B) establishes additional

height requirements for various zones and situations: Conservancy Recreation and Residential Districts, Commercial Districts, Front Setbacks, Side or Rear Setbacks. The applicant is not proposing to locate any fences in any required setback areas.[46] The Applicant is proposing fencing exceeding seven feet in height and a building permit for such fences is required per IMC 18.07.120(B)(5). The Applicant is proposing wrought iron fencing where appropriate based on adjacent facilities consistent with IMC 18.07.120(C) and black vinyl coated chain link fencing where necessary for recreational activities. Existing mature vegetation and proposed landscape will provide the screening necessary to ensure a compatible transition between abutting land uses. No electric or barbed wire fences are proposed and IMC 18.07.120(D)-(E) are not applicable.

IMC 18.07.120(H) requires the installation of a three-foot-high guardrail or fence along the top of any retaining wall or rockery exceeding six feet in height. The Applicant is proposing to embed a black vinyl coated chain link fence into the top of any retaining wall that exceeds six feet in height. The proposed fencing exceeds the minimum guardrail requirement by one foot and therefore an additional 1.5 foot setback for the fence applies. The Applicant has shown that the retaining walls with embedded fence are at least 1.5 feet from the property line and will comply with this requirement.

CONCLUSION: As conditioned, the fencing proposal complies with the requirements in CIDDS 10.8.A, the design standards in CIDDS 16.3A-D and F, and applicable fence standards in IMC 18.07.120.

f. CIDDS 10.8.B Landscape Requirements for Hedges

The Applicant is not proposing the use of hedges for screening or other purposes. This requirement does not apply.

g. CIDDS 10.8.C Landscape Requirements for Waste Enclosures

CIDDS 10.8.C requires waste containers to be enclosed behind a wall that is the greater of six feet in height and at least one foot higher than the waste containers. CIDDS 16.3.E requires that, where large fences are used to screen undesirable elements, then articulation, artwork, and/or landscaping should be used to soften the visual effect of the structure and that full height fences should be used to screen unsightly facilities such as waste collection areas. The high school waste enclosure is proposed to be screened by a 10-foot wall and the vehicle entry to the enclosure faces eastward, away from pedestrian and vehicular activity. No gate is proposed at the enclosure entry but is required to ensure students and drivers do not enter the enclosure by mistake. **[CONDITION 23]** The elementary school loading dock and waste enclosure is proposed to be screened by a 9.5-foot fence; the entry faces

[46] Public schools in the CF-F zone do not have a required front setback.

eastward and will be screened by a sliding gate matching the screening fence. A standard commercial dumpster is approximately five feet in height.

CONCLUSION: These enclosures comply with the requirements in CIDDS 10.8.C and CIDDS 16.3.E.

h. CIDDS 10.8.D Landscape Requirements for Mechanical Equipment

CIDDS 10.8.D requires mechanical equipment not contained within buildings to be screened from view. The Applicant proposes to contain all mechanical equipment within the buildings.

CONCLUSION: The proposal complies with the requirements in CIDDS 10.8.D.

i. CIDDS 10.9 Blank Walls and Retaining Walls

CIDDS 10.9 establishes requirements for blank walls that front on circulation facilities which are intended to enhance the pedestrian experience and reduce the perceived scale. The Applicant provided building elevations to demonstrate consistency with blank wall standards in CIDDS 10.9.A, which require compliance with the requirements in CIDDS 14.2.B and indicate that additional landscape may be required to enhance the blank wall and pedestrian experience.[47] The school buildings are designed with a combination of articulation, modulation, detailing, and varied materials and textures that provide visual interest, an enhanced pedestrian experience, and a reduction in perceived scale. The parking garage is designed with green screens and other landscape areas to provide visual relief. Parking garage species include trees that will grow to heights of 20 feet (Vine maple), 30 feet (Cascara), 35 feet (Shore pine), 40 feet (Pyramidal cedar, Persian parrotia), 60 feet (Serbian spruce), and 200 feet (Western red cedar) underplanted with shrubs and groundcovers to provide variation in foliage and texture while screening the building. The buildings are designed such that there is no "back side." The project complies with blank wall requirements.

Retaining walls exceeding four feet in height are subject to additional requirements in CIDDS 10.9.B, which requires such walls to be landscaped and terraced where possible or to incorporate the use of decorative wall materials or raised planter beds and refers to CIDDS Chapter 16.0 *Landscape* for additional requirements. The proposal includes many retaining walls that exceed four feet in height. The Applicant provided a retaining wall diagram (Attachment 99, Sheet L1.9LU – Landscape Plans) indicating the proposed location, maximum height, material, and aesthetic treatment for each wall in the proposal. These characteristics are summarized in Table 9 on the following pages.

[47] Although CIDDS 10.9.A refers also to CIDDS Chapter 16.0 *Landscape* there are no specific requirements for blank walls in that chapter except a reference to landscape requirements in CIDDS Chapter 10.0 *Landscape.*

Table 9: Summary of Retaining Wall Aesthetic Treatments. Source: ISD (Attachment 99, Sheet L1.9LU – Landscape Plans).

Wall No.[48]	**Wall**	**Min. Height** (ft.)	**Max. Height** (ft.)	**Material**	**Aesthetic Treatment**
1A	Elementary North Parking Lot, Playground, and West Bus Loop Driveway	0.5	22.3	MSE	Landscape – Exist. Vegetation, Terraced, Textured
1B	Elementary School – Entry Street	0.5	18	MSE	Landscape – Exist. and New Vegetation, Textured
2	Bus Loop Driveway – East	0.5	16.9	MSE	Terraced, Textured
3	ADA Pathway – West	0.0	9.0	MSE	Landscape – Exist. Vegetation, Textured
4	ADA Pathway – East	0.0	12.7	MSE	Landscape – Exist. Vegetation, Textured
5	Right-of-Way – South & Entry Drive – East, South SIde	0.3	13.4	MSE	Terraced, Textured
6		4.0	10.0	MSE	
7	Fire Lane and High School Exit Road – East	0.5	14.5	MSE	Landscape – Exist. Vegetation, Textured
8	Parking Garage – Lower Level – South	0.5	10.5	MSE	Landscape – New Vegetation, Textured
9	Stadium – East	0.0	16.5	MSE	Landscape – New Vegetation, Textured
10	Parking Garage - Northwest	0.0	18.4	MSE	Terraced, Textured
11		0.5	10.0	MSE	
23		0.0	6.0	MSE	
12	Entry Drive – Central, South of Ball Fields	0.0	10.0	MSE	Textured
13	Stadium – North	0.0	14.0	MSE	Landscape – Exist. Vegetation, Textured
14	Softball – Outfield	0.1	10.0	MSE	Landscape – Exist. Vegetation, Textured

[48] Wall numbers labeled on Attachment 97, Sheet C1.0LU – Civil Plans.

Wall No.[48]	Wall	Min. Height (ft.)	Max. Height (ft.)	Material	Aesthetic Treatment
15	Baseball – Outfield	0.0	37.8	MSE	Landscape – Exist. Vegetation, Textured
16	Right-of-Way – North	1.0	4.0	MSE	Terraced, Textured
17		0.5	11.9	MSE	
18	Elementary School – Playground South	0.0	6.0	Cast-in-Place	Terraced, Textured
19	Baseball – Infield	0.0	3.0	Cast-in-Place	Terraced, Flat Finish NOTE: Seating Wall
20	Baseball – Plaza	0.0	4.0	Cast-in-Place	Terraced, Flat Finish NOTE: Seating Wall
21	Baseball – Plaza	0.0	4.5	Cast-in-Place	Terraced, Flat Finish NOTE: Seating Wall
22	Baseball – Plaza	0.0	4.0	Cast-in-Place	Terraced, Flat Finish NOTE: Seating Wall
None	Elementary School – Entry Plaza		<4ft	Cast-in-Place	Flat Finish NOTE: Seating Wall
None	Elementary School – Loading Dock		<4ft.	Architectural Wall	None
None	Elementary School – Playground North		<4ft.	Cast-in-Place	Terraced, Textured
None	Stadium – South		<4ft.	Cast-in-Place	Landscape – New Vegetation, Flat Finish NOTE: Seating Wall

The Applicant has proposed a variety of aesthetic treatments based on each wall's surrounding context. Wall 1A is terraced, textured, and landscaped. Walls 1B, 3-4, 7-9, and 13-15 are textured and landscaped. Walls 2, 5-6, 10-11 and 23, and 16-17 are terraced and textured. Wall 12 is only textured. Seating walls (Walls 19-22 and the unnumbered walls identified in Table 9, above) are flat-finished to facilitate a comfortable gathering experience. All mechanically stabilized earth (MSE) walls will be treated with a textured surface to provide an aesthetically pleasing appearance that blends into the background of the development (Attachment 99, Sheet L1.9LU – Landscape Plans), shown in Figure 19 on the following page. The proposed treatments are consistent with the requirements in CIDDS 10.9.A and CIDDS 14.2.B.

Where terracing is proposed, walls are approximately five feet from back of wall to front of wall along 228th Avenue SE. Elsewhere in the site, terracing width varies but is typically at least 6.5 feet from front of wall to back of wall. The Applicant is proposing cast-in-place concrete seating walls finished with a flat surface at the base of a new planting area, turf area, or plaza area (Attachment 99, Sheet L1.9LU –

Landscape Plans). Flat finishes are not acceptable as an aesthetic treatment and the Applicant is required to submit an approvable alternative. **[CONDITION 24]** Where necessary to traverse the grades, the Applicant has proposed terracing walls to reduce overall bulk. The Applicant has proposed limited terracing, however, to reduce site grading and protect as many trees as possible. Proposed landscaping is a mix of existing, mature vegetation and new planting areas that will grow to screen the walls. New plantings consist of a mix of evergreen and deciduous trees, shrubs, vines, and groundcovers.

CONCLUSION: As conditioned, the proposed retaining walls meet the landscaping requirements in CIDDS 10.9.B.

Figure 19: Proposed Texture for MSE Walls. Source: ISD (Attachment 99, Sheet L1.9LU – Landscape Plans).

j. CIDDS 10.10.A Tree Density

CIDDS 10.10.A requires a minimum tree density of four significant trees per 5,000 square feet of developable site area.

The Applicant submitted Tree Evaluation and Retention Report prepared by Zsofia Pasztor, a certified arborist, dated April 2021 (Attachment 50 – Arborist Report). The report was peer-reviewed by Urban Forestry Services and found to be in conformance with best practices and City requirements for arborist reports. The developable site area[49] was calculated to be 1,776,633 square feet[50] and the project requires a minimum tree density of 1,422 trees:

$$\frac{1{,}776{,}633}{5{,}000} * 4 = 1{,}421.3, \text{ rounded down to } \mathbf{1{,}421 \text{ significant trees}}$$

[49] The definition of "developable site area" is the same in the CIDDS and the IMC.

[50] This value is different than the developable site area used for calculating FAR because community space cannot be deducted for calculating tree density.

According to the arborist report, the Applicant will retain 662 significant trees (Attachment 50, Page 2 – Arborist Report) and according to the landscape plans, the Applicant will plant 900 new trees (Attachment 99, Sheet L2.0.ALU – Landscape Plans). Only 418 of the proposed trees will meet the minimum size requirements in CIDDS 10.14 (two-inch caliper for deciduous species, seven feet high for coniferous species). The Applicant is required to increase the size specifications for at least 341 trees to meet minimum tree density requirements. **[CONDITION 25]** After replanting, the property will have at least 1,421 significant trees on the property.

CONCLUSION: As conditioned, the proposal complies with the minimum tree density requirement.

k. CIDDS 10.11.A Tree Removal on Vacant Properties

The Applicant will retain all trees on the property until project development commences pursuant to CIDDS 10.11.A. The Applicant is proposing to protect trees during construction in the designated vegetated buffer areas around the perimeter of the property, including at Wetland B.

CONCLUSION: The project complies with CIDDS 10.11; CIDDS 10.12 is not applicable because removal will occur as part of the site development.

l. CIDDS 10.13.A Tree Retention Requirements and AAS21-00001

The Applicant is required to retain at least 25 percent of the total caliper inches DBH of all significant trees in the developable site area per CIDDS 10.13.A. CIDDS 10.13 states: "Individual deciduous trees or clusters of trees with outstanding qualities, form and health shall be retained whenever possible. … Trees shall not be designated for retention if they are dead or in a declining state, or if they are hazardous." Therefore, the baseline for calculating tree retention begins with healthy trees and ends with a minimum of 25% healthy trees retained.

In 2019 when the City began working with the applicant on the project, the applicant proposed tree retention of only 13.6 percent as part of their Pre-App submittal (PRE19-00005). At the Community Conference held in July 2020, the applicant proposed 18 percent tree retention (COM20-00001). Retaining healthy trees on site is consistent with City standards and expectations, and the City has consistently pressed for improved tree retention since that initial Pre-App meeting. Because the Applicant's proposal did not meet the 25 percent tree retention requirement, an AAS to request a reduction of tree retention requirements was required.

As requested by the City, the Applicant modified its plans and proposed an increase in the percentage of retained trees. In addition, the Applicant submitted an AAS (**Permit no. AAS21-00001**) for a reduction of tree retention requirements from 25 percent to 23 percent pursuant to CIDDS 10.13.B *Modification to Tree Retention Requirements*. See Section VII.A.14.m of this Staff Report, below. This AAS

is based on including dead and dying trees in the baseline calculation. Including dead and dying trees in the baseline calculation, however, is contrary to the purpose of CIDDS 10.13A, and, therefore, dead and dying trees should not be included. Based on the updated information presented by the Applicant and as described below, an AAS is no longer needed to meet tree retention requirements.

The Tree Evaluation and Retention report prepared by Zsofia Pasztor, dated April 2021, determined that there are 2,847 significant trees on the site and that 2,185 significant trees will be removed. Tree removal is calculated based on caliper inches DBH. The total caliper inches DBH of existing significant trees[51] is 44,357 (47,417 minus 3,003 inches from dead trees and 57 inches from dying trees). The total caliper inches DBH of existing significant trees to be removed is 32,948(35,984 minus 3,003 inches from dead trees, 33 inches from dying trees), yielding a tree retention of 26 percent:

$$\frac{44{,}357\text{-}32{,}948}{44{,}357} * 100 = 26\%$$

Table 10: Comparison of Tree Retention Calculation Methods and Results

	Calculated per CIDDS for Healthy Trees	
	Required	**Proposed**
Percent Retained	25%	26%
Caliper Inches Retained	11,089in.	11,409in.
Surplus/Deficit		+1% +320in.

The arborist report indicates that a one percent contingency is appropriate given the declining condition of some trees and the stresses that construction could cause.

Based on this information, the Applicant **COMPLIES** with tree retention requirements in CIDDS 10.13.A. Nonetheless, even if dead and dying trees are included in the baseline calculation for determining the retention percentage, the Applicant meets the criteria of approval for AAS21-00001, as follows.

[51] Per CIDDS 2.0, **Tree, significant** means: "A tree at least six (6) inches or greater at DBH, or an alder or cottonwood tree eight (8) inches or greater at DBH. Any trees that are listed on the King County complete weed list shall not be considered significant…." Significant trees are not defined as including dying, dead, or hazardous trees but by their caliper size.

The Applicant indicated that most significant trees to be retained are (Attachment 25 – Tree AAS Narrative):

- Located within previously undeveloped areas to maintain a natural, mature buffer around the perimeter of the site.
- Located on existing slopes greater than 20 percent inclination.
- Adjacent to and surrounding Wetland B.
- Clustered with other tree groupings to preserve undergrowth.

This approach to tree retention is consistent with the priorities listed in CIDDS 10.13.A.2-3.

Modifications to the requirements in CIDDS 10.13.A can be granted only if the request meets the criteria in CIDDS 10.13.B. The Applicant must meet criteria 1-4 and/or criterion 5 and must meet criterion 6 in the request, as follows:

1. The modification is consistent with the purpose and intent of CIDDS Chapter 10.0 *Landscape* and the Central Issaquah Plan goals and policies.
2. The modification incorporates the retention of groupings of smaller trees that make up the equivalent diameter inches and retains other natural vegetation.
3. The modification is necessary because physical characteristics of the property may jeopardize reasonable use of the property and there are no reasonable alternatives.
4. The modification is necessary because certain development requirements may jeopardize the reasonable use of the property and there are no reasonable alternatives that are consistent with the Central Issaquah Plan.
5. The modification is necessary to provide solar access to a building that incorporates active solar devices.
6. The applicant replaces trees or pays in-lieu fees consistent with 10.14.C-D Replacement Trees.

The Applicant indicated that meeting the 25 percent retention requirement is infeasible due to property and project constraints including site topography, the poor (diseased, dying, or declining) condition of many existing trees, required right-of-way development and dedication for traffic mitigation, and operational functions. In particular, the Applicant identified two key issues necessitating the AAS request:

1. Required right-of-way improvements necessitate the removal of 223 trees totaling 3,090 caliper inches along 228th Avenue SE. These are not allowed to be deducted from the initial tree count, but must be counted as removed trees.
2. Many existing trees are in poor condition (declining), dying, or dead. These trees must be included in the initial tree count but are not allowed to be counted as retained trees. Some declining trees must be removed for safety or to protect other healthy trees.

The Applicant indicated that, if the dead and dying trees were removed from the tree count, the project would exceed tree retention requirements (25.7%). This

method of calculation is more consistent with the intent of tree retention, which prioritizes healthy trees.

The Applicant provided a narrative to address the modification request and approval criteria (Attachment 25 – Tree AAS Narrative):

1. *The modification is consistent with the purpose and intent of this Chapter, and the Central Issaquah Plan goals and policies.*
   Staff Analysis: CIDDS 10.1 states that the intent of the Chapter is "to establish minimum standards for landscaping and trees within Central Issaquah that draw nature into this developing urban community. Adding green elements to soften the urban form provides opportunities for transitions from the natural edges into the built environment and ensures a livable, verdant, attractive Public Realm that restores both nature and human activity and contributes to the success of the establishment of the Green Necklace…."

   The requested modification will retain 23 percent of the caliper inches DBH on the property, and trees to be retained are located primarily around the perimeter of the property. Trees are retained as healthy tree groupings with associated undergrowth, a key priority identified in CIDDS 10.13.A.2.b. Retaining high-priority trees, especially around the perimeter of the property, is consistent with the intent to soften the urban form and provide opportunities for transitions from the natural edges into the built environment and to ensure a verdant and attractive public realm. It is also consistent with many public comments submitted on the project. The modification is consistent with the purpose and intent of Chapter 10.0 CIDDS.

   The goals and policies of the *Central Issaquah Plan* are intended to guide development in Central Issaquah and are not as useful in determining whether the proposed modification is appropriate outside of Central Issaquah. Nevertheless, the proposed modification is consistent with the plan objectives to integrate environmental features into development projects and ensure the unique natural qualities that make Issaquah special are retained. The proposal supports the following *Central Issaquah Plan* policies:
   - UC Policy A8: Integrate landscaping, courtyards, plazas, public art, and critical areas and buffers into developments to enrich the urban landscape and establish a sense of place.
   - UC Policy B5: Integrate natural features such as wetlands, riparian corridors, and hillside views into the site design as amenities and protect them as environmental resources.

   The proposal complies with this criterion.

2. *The modification incorporates the retention of a grouping(s) of smaller trees that make up the equivalent diameter inches and retains other natural vegetation occurring in association with the smaller tree grouping(s).*
   Staff Analysis: The Applicant is proposing to retain trees in large, contiguous groupings that will remain undisturbed during construction except for select tree removal necessary to eliminate strike risks to people and property. The Applicant surveyed the smaller trees (Attachment 52 – Small Tree Survey) and the retention of groupings of smaller trees will more than make up the equivalent diameter inches. The Applicant is required to retain 25 percent (11,854 caliper inches) of trees and is approximately two percent (421 caliper inches) short of the requirement. The smaller trees to be retained on the project site add up to 857 caliper inches, exceeding the retention requirement. The Applicant will be required to retain enough small trees on the site to meet the minimum retention requirements. **[CONDITION 26]** As conditioned, the proposal complies with this criterion.

3. *The modification is necessary because the size, shape, topography, location of the subject property may jeopardize the reasonable use of the property and reasonable alternatives do not exist.*
   Staff Analysis: Establishing a high school and elementary school is a reasonable use of the site. The site was once used as the Providence Heights College and the CF-F zoning allows both high schools and elementary schools on the site. Strict enforcement of the tree retention requirements jeopardizes the placement of the schools on the site due to topography. Schools are typically constructed on large, flat areas, but such properties were not available when ISD conducted its extensive property search (see Section VII.A.17 of this Staff Report, *Alternatives Analysis,* for additional information) and are rare to non-existent within City limits. To provide the necessary facilities to support a quality public education while minimizing grading and tree removal, the Applicant has proposed a number of retaining walls around the property (Attachment 99, Sheet L1.9LU – Landscape Plans) and has eliminated portions of the standard school programs. The Applicant investigated reasonable alternatives to design and build public schools on this site with necessary supporting facilities, all of which resulted in more trees removed.[52] The proposal complies with this criterion.

4. *The modification is necessary because the proposed buildings and site layout, required ingress/egress, existing and proposed utility locations, trails, storm drainage improvements or similar constraints may jeopardize the reasonable use*

[52] This analysis is based on the quantity of site plan iterations reviewed and discussed over the course of this project.

of the property and reasonable alternatives that are consistent with the Central Issaquah Plan do not exist.
Staff Analysis: The Applicant addressed essential operational functions, safety, traffic, and other considerations in the design and layout of the project. The proposal includes the minimum program needed to meet educational requirements for a high school and an elementary school. The school buildings are separated to minimize interactions between students in different age groups and to provide adequate facilities for emergency response vehicles. The proposal accommodates a significant amount of vehicle queueing and parking on the site to minimize impacts to the surrounding roadway network. The proposed buildings and site layout and unique operational and programmatic needs for school facilities limit reasonable alternatives. The proposal is consistent with this criterion.

5. *The modification is necessary to provide solar access to a building that incorporates active solar devices. Windows are solar devices only when they are south-facing and include special storage elements to distribute heat energy.*
Staff Analysis: Per CIDDS 10.13.B, this criterion is optional and compliance is not required. No solar devices are proposed. This criterion is not applicable.

6. *The applicant replaces trees on site and/or off-site or pays a fee in-lieu-of in accordance with 10.14.C-D Replacement Trees for reductions less than the minimum tree density requirement.*
Staff Analysis: The Applicant will plant 900 replacement trees on site, which exceeds the required number of replacement trees. The proposal complies with this criterion.

The Applicant provided additional justification for the requested modification (Attachment 25 – Tree AAS Narrative) noting that the dead and dying trees pose safety risks if left in place and that they could limit the viability of retained healthy trees. Retention of dead and dying trees also conflict with the intent of tree density, which is maintaining a living tree canopy. The Applicant indicates that if the dead and dying trees are retained, the site would achieve the minimum tree retention requirements, but dead and declining trees are expressly excluded from the calculation of retained trees per CIDDS 10.13. If dead (3,003 caliper inches) and dying (57 caliper inches) trees were removed from the tree count, the project would exceed its minimum tree retention requirement:

$$\frac{44{,}357 - 32{,}948}{44{,}357} * 100 = 26\%$$

It is also important to note that tree replacement regulations require the planting of healthy trees based on healthy trees *and* dead and dying trees. Although the new

trees are smaller, the trees will grow into a size that more than compensates for the removal of dead and dying trees.

Table 11: Comparison of Tree Retention Calculation Methods and Results

	Calculated per CIDDS			Calculated per CIDDS w/ Dead & Dying Trees Removed		
	Required	**Proposed**	**Proposed w/ Small Trees Added**	**Required**	**Proposed**	**Proposed w/ Small Trees Added**
Percent Retained	25%	23%	26%	25%	26%	28%
Caliper Inches Retained	11,854in.	11,433in.	12,290	11,089in.	11,409in.	12,266
Surplus/Deficit		-2% -421in.	+1% +436in.		+1% +320in.	+3% +1,177in.

CONCLUSION: The proposal **COMPLIES** with the tree retention requirements in CIDDS 10.13.A without the need for an AAS. In the alternative, the proposal, as conditioned, will meet the criteria in CIDDS 10.13.B for reduction of minimum tree retention requirements as set forth in CIDDS 10.13.A and Staff recommends **APPROVAL** of the requested modification to tree retention requirements.

m. CIDDS 10.14.A.2 Replacement Trees

Replacement trees are required when tree removal and replanting results in the remaining tree density being below the minimum requirement per CIDDS 10.14.A.2. Tree removal will result in a tree density of 662 trees, less than the 1,421 trees required per CIDDS 10.10, and the Applicant will plant 900 new trees resulting in 1,562 significant trees on site. The Applicant has proposed replacement trees in a variety of sizes and will be required to meet the minimum requirements for replacement trees in CIDDS 10.14.A.3.a and CIDDS 10.14.B of trunk size or height and quality **(Condition 25)**.

CONCLUSION: As conditioned, the proposal complies with replacement tree requirements.

n. CIDDS 10.15 Tree Maintenance, Landscape Maintenance, and Bond Requirements

The Applicant is required to provide irrigation for all new plantings for a three-year establishment period. Maintenance of vegetation in the buffer area will be authorized pursuant to the easement, covenant, or other legal instrument required by Condition 7 and will be required to comply with pruning requirements (including prohibition on topping) at the time pruning occurs. As conditioned, the proposal complies with tree maintenance requirements in CIDDS 10.15.

CONCLUSION: The Applicant is required to maintain other landscape areas consistent with the requirements in CIDDS 10.16.A-B. A bond, surety, or financial guarantee for performance is not required per established City policy.

o. CIDDS 10.17 Landscape Requirements and Specifications

The Landscape Requirements and Specifications set forth in CIDDS 10.17 provide construction-level guidance for the selection, installation, and maintenance of landscape materials. The Applicant has provided landscaping plans identifying proposed types, quantities, and sizes of plant materials that generally conform to the requirements in CIDDS 10.17.F (Attachment 99, Sheet L2.0.ALU – Landscape Plans). Verification of compliance with specific requirements and specifications will occur with the landscape construction plans and/or as future maintenance and pruning is proposed. Landscape permits will not be issued until compliance is verified and a Certificate of Occupancy will not be issued until the installed landscape has been inspected and accepted. The proposal will satisfy appliable landscape requirements and specifications.

IMC 18.07.480(E)(14) CONCLUSION: As conditioned and if the AAS modification of tree retention requirements is approved, the proposal complies with applicable landscaping requirements set forth in CIDDS 10.0 *Landscape.*

15. IMC 18.07.480(E)(15): SIGNS

SECTION SUMMARY:

The City adopted its sign code regulations in fall 2021 and this sign code applies to the project. The Development Commission no longer reviews sign permits in any parts of the city. The proposal meets applicable sign code requirements, including for the electronic readerboard at the campus entry.

IMC 18.07.480(E)(15) requires all signs to be kept to a minimum size which is compatible with the surrounding neighborhood and uses, while providing adequate visibility. Regulations for signs are set forth in Chapter 18.11 IMC and provide the basis for determining acceptable size for compatibility. IMC 18.11.050(G) establishes requirements for community facilities signs.

The Applicant is proposing to install a monument sign with electronic readerboard at the main entry to the school along 228th Avenue SE and a smaller monument sign at each school building. These sign types are allowed in the CF-F zone, and dimensional requirements are set forth in Tables 18.11.050(G)(2)(a) and (b). Each of these signs is considered a primary sign and the subject property is allowed up to three primary signs per IMC 18.11.050(G)(3)(a). Each proposed sign meets applicable face, square footage per face, height, and setback requirements. Signage will be reviewed in further detail with construction permits to confirm compliance for each sign.

IMC 18.07.480(E)(15) CONCLUSION: The proposed signage meets applicable dimensional requirements set forth in Chapter 18.11 IMC to ensure compatibility with the surrounding neighborhood and uses while ensuring adequate visibility.

16. IMC 18.07.480(E)(16): STRUCTURED PARKING

Additionally, IMC 18.07.480(E)(16) requires all new public schools to provide a minimum of 50 percent of the required parking in a structure. The Applicant has indicated that approximately 67 percent (447 of the provided 667 on-site parking spaces) are in the parking structure.

CONCLUSION: The proposal meets structured parking requirements.

17. IMC 18.07.480(E)(17): SITE ALTERNATIVES ANALYSIS

IMC 18.07.480(E)(17) requires demonstrating that alternative sites have been considered and that the proposed site is best suited for the development. The Applicant performed a site selection analysis and eminent domain (condemnation) process to demonstrate that the subject property is required and necessary for the purposes of a school under State law[53] (Attachment 18 – Land Use Response Letter dated 2/22/2021).

In 2012, the King County School Siting Task Force issued a final report and recommendations leading to an amendment of the King County Comprehensive Plan's Countywide Planning Policies that prohibited siting of new schools outside the Urban Growth Boundary (UGB). ISD worked with a professional real estate broker to identify a suitable parcel inside the UGB that met certain site selection criteria such as size and location near school populations. The broker determined that the subject property was the only viable site within the UGB for a high school program. Refer to Attachment 18 – Land Use Response Letter dated 2/22/21 for additional information. The Applicant has demonstrated that alternative sites were considered and that the subject property is best suited for the proposed development.

IMC 18.07.480(E)(17) CONCLUSION: The Applicant performed a site alternatives analysis prior to obtaining the subject property and the proposal complies with this requirement.

18. IMC 18.07.480(E)(18): NONCONFORMING SITUATIONS

The proposal is for new development and there are no existing, legal nonconformities to remain. IMC 18.07.480(E)(18) does not apply.

IMC 18.07.480(E)(18) CONCLUSION: This requirement does not apply.

[53] See RCW 8.16.050.

SECTION VII.A ZONING DISTRICT, USES, AND STANDARDS SUMMARY CONCLUSON: Based on the foregoing analysis, as conditioned, and upon approval of the requested AASs, the proposal is consistent with applicable requirements and review criteria.

B. Environmentally Critical Areas

The subject property contains environmentally critical areas regulated under Chapter 18.10 IMC (Critical Areas Regulations sections in IMC 18.10.340-930), including landslide hazard areas,[54] steep slope hazard areas,[55] erosion hazard areas,[56] wetlands,[57] and critical aquifer recharge area (CARA).[58] Development in or near these critical areas must comply with specific regulations for each critical area, as described below. The Applicant is required to submit a critical areas study that confirms the nature and type of the critical area, determines whether the proposal is consistent with applicable regulations, and evaluates proposed alterations to critical areas and the type of mitigation and monitoring required to offset potential impacts. For almost all of these, the City performs a peer review and resolves comments and concerns prior to approving the final critical area report. In addition, an Environmental Neighborhood Meeting is required to give the community the opportunity to ask questions and contribute information to these reports. The meeting was held on April 28, 2021 and the information from the meeting is included as Attachments 84-87 for assistance in making a decision on these applications.

---

[54] Pursuant to IMC 18.10.390, **Landslide hazard areas** means: "Landslide hazard areas: Those areas of the City subject to a severe risk of landslide. A geotechnical report is required for all relevant projects to determine steepness of slope, permeability of soils, occurrence of springs, and groundwater level. The study shall be performed by a licensed geotechnical engineer. Landslide hazard areas include the following areas: (A) Slopes greater than forty (40) percent….

[55] Pursuant to IMC 18.10.390, **Steep slope hazard areas** means: "Any ground that rises at an inclination of forty (40) percent or more within a vertical elevation change of at least ten (10) feet (a vertical rise of ten (10) feet or more for every twenty-five (25) feet of horizontal distance). A slope is delineated by establishing its toe and top and measured by averaging the inclination over at least ten (10) feet of vertical relief."

[56] Pursuant to IMC 18.10.390, **Erosion hazard areas** means: "Those areas of King County and the City containing soils which, according to the USDA Soil Conservation Service, the 1973 King County Soils Survey and any subsequent revisions or additions thereto, may experience severe to very severe erosion hazard. This group of soils includes, but is not limited to, the following when they occur on slopes of fifteen (15) percent or greater: Alderwood gravelly sandy loam (AgD)…Beausite gravelly sandy loam (BeD and BeF)…."

[57] Pursuant to IMC 18.10.390, **Wetlands** means: "Areas that are inundated or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions…."

[58] Pursuant to IMC 18.10.390, **Critical aquifer recharge areas (CARAs)** means: "Areas that are determined to have a critical recharging effect on aquifers used as a source for potable water, and are vulnerable to contamination from recharge."

1. *IMC 18.10.520 and IMC 18.10.560-580: GEOLOGICALLY HAZARDOUS AREAS*

SECTION SUMMARY:
Geologically hazardous areas, including landslide hazard areas, steep slope hazard areas, erosion hazard areas, and seismic hazard areas were identified on the site and evaluated in a geotechnical engineering report prepared by a qualified professional and approved by the City's third-party review consultant. The proposal complies with applicable development standards for work in geologically hazardous areas.

The Applicant submitted a Subsurface Exploration, Geologic Hazard, and Geotechnical Engineering Report prepared by Associated Earth Sciences, Inc. (AESI), dated September 17, 2019, and revised June 17, 2021[59] (Attachment 42 – Geotechnical Report). The City's third-party geotechnical consultant Wood Environment & Infrastructure Solutions, Inc. reviewed the report and determined it conforms to requirements for critical areas studies set forth in the IMC and was prepared consistent with best practices for geotechnical investigations and the proposal complies with applicable development standards (Attachments 44 and 45 – Peer Review Approval and Comments Resolution).

a. IMC 18.10.560 and IMC 18.10.580: Landslide Hazard Areas and Steep Slope Hazard Areas

The report documents slope inclinations that range from approximately 30 percent or less to a maximum of approximately 50 percent. Slopes exceeding 40 percent meet the definition of "landslide hazard areas" set forth in IMC 18.10.390 and are identified in Figure 20 on the following page. Slopes exceeding 40 percent and with a vertical elevation change of at least 10 feet also meet the definition of "steep slope hazard areas" set forth in IMC 18.10.390. Because all of these slopes on the property are less than 20 feet in height, they are eligible for the limited exemption from critical areas regulations in IMC 18.10.580(E)(1).

The Applicant is proposing grading across the site that will impact and, in many cases, eliminate landslide and steep slope hazard areas. The grading will impact natural steep slopes that are five feet in height or less and man-made slopes that are eligible for limited exemptions from critical areas regulations in IMC 18.10.580(E).

The geotech report analyzed slope stability and determined that the exemption will result in no adverse impacts for the natural slopes and the man-made slopes (Attachment 42, Pages 12-13 – Geotechnical Report). The report, as approved by

[59] The Applicant also submitted a Landslide Hazard Assessment memorandum. This information has been incorporated into the Subsurface Exploration, Geologic Hazard, and Geotechnical Engineering Report prepared by Associated Earth Sciences, Inc. (AESI), dated September 17, 2019, and revised June 17, 2021. The City's third-party geotechnical consultant reviewed both documents. No further analysis of the memorandum is included in this Staff Report.

Figure 20: Slopes Exceeding 40% Inclination. Annotations provided by Staff. Source: Subsurface Exploration, Geologic Hazard, and Geotechnical Engineering Report prepared by Associated Earth Sciences, Inc. (AESI), dated September 17, 2019, and revised June 17, 2021 (Attachment 42, Page 41, Fig. 4 – Geotechnical Report).

the City's third-party peer reviewer, concludes that the request complies with the City's steep slope hazard and landslide hazard areas development standards. The existing steep slopes that remain, and which have a vertical change of 20 feet or more, are subject to the protection mechanisms for steep slopes consistent with IMC 18.10.580. **[CONDITION 27]**

b. IMC 18.10.570: Seismic (Earthquake) Hazard Areas

Seismic hazard areas are regulated under IMC 18.10.570, which allows alterations when mitigation is implemented per IMC 18.10.570(A)(2). The Subsurface Exploration, Geologic Hazard, and Geotechnical Engineering Report evaluated subsurface conditions that could create seismic hazards through surficial ground rupture, seismically-induced landslides, liquefaction, and ground motion. The report recommends compliance with Site Class "C" building design standards defined in IBC Table 20.3-1 to mitigate potential seismic risks to building occupants (Attachment 42, Page 18 – Geotechnical Report). No other seismic hazards were identified in the report. The Applicant will be required to adhere to the recommended seismic design standards. **[CONDITION 28]**

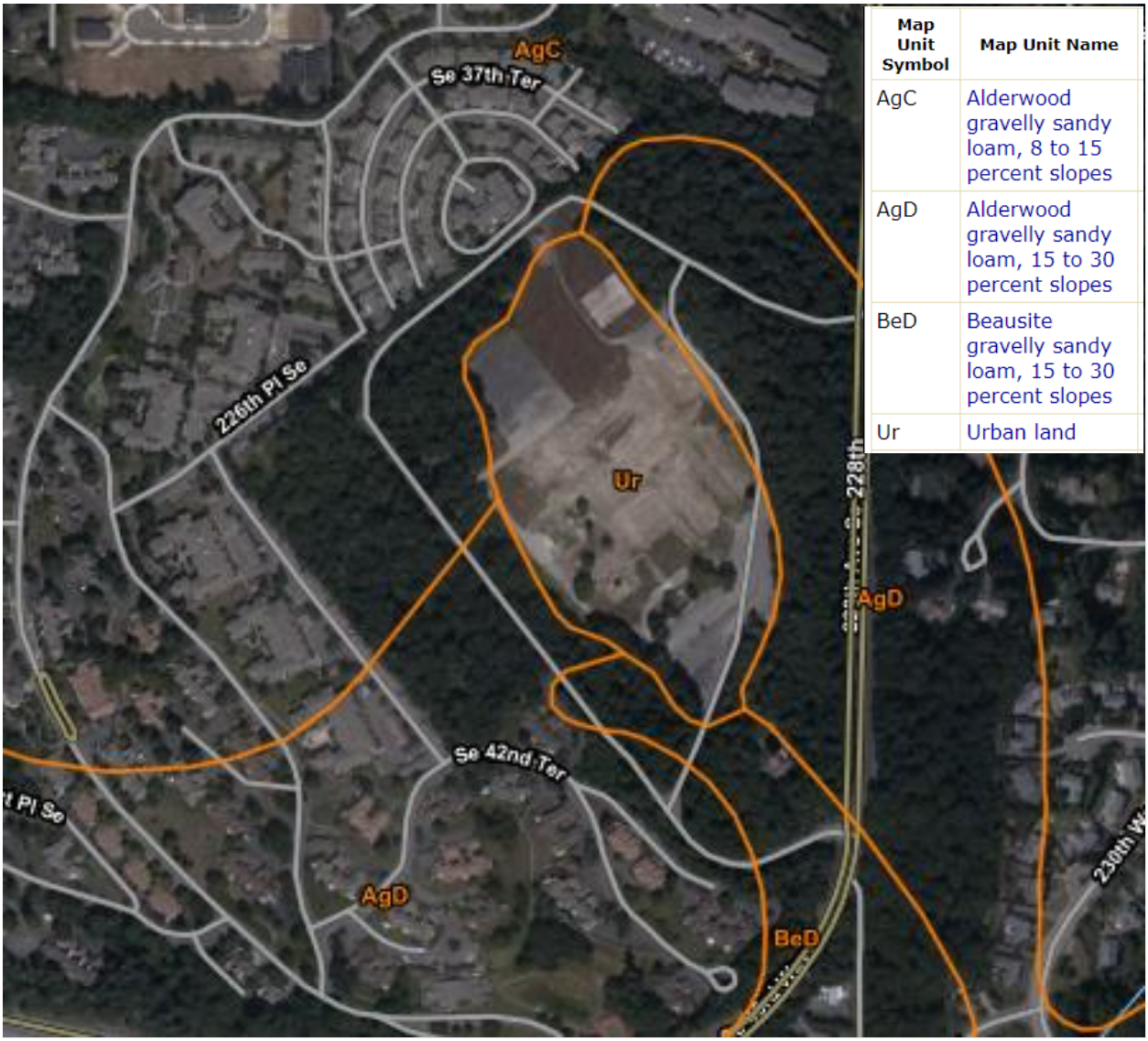
c. IMC 18.10.520: Erosion Hazard Areas

The Subsurface Exploration, Geologic Hazard, and Geotechnical Engineering Report evaluated subsurface conditions that could be sensitive to erosion and disturbance when wet. The report identified Alderwood gravelly sandy loam and Beausite gravelly sandy loam soil types in areas exceeding 15 percent slope; these areas are classified as erosion hazard areas. Figure 21, on the following page, identifies the soil types on the project site, as mapped by the National Resource Conservation Service's Web Soil Survey. Soil types AgD and BeD are sensitive soils exceeding 15 percent inclination and meet the definition of erosion hazard areas.

IMC 18.10.520 restricts work in erosion hazard areas to occurring between April 1 and November 1 and specifies general best management practices and other requirements for working in erosion hazard areas. The Applicant will be required to adhere to specified best management practices, wet weather work restrictions, and the recommendations included in the report. **[CONDITION 29]**

The Applicant will be required to incorporate all design recommendations identified in the Subsurface Exploration, Geologic Hazard, and Geotechnical Engineering report. **[CONDITION 30]** As conditioned, the proposal complies with applicable requirements for steep slope hazard areas, landslide hazard areas, seismic hazard areas, and erosion hazard areas.

IMC 18.10.520 and IMC 18.10.560-580 CONCLUSION: The proposal, as conditioned, complies with applicable development requirements for geologically hazardous areas.



Map Unit Symbol	Map Unit Name
AgC	Alderwood gravelly sandy loam, 8 to 15 percent slopes
AgD	Alderwood gravelly sandy loam, 15 to 30 percent slopes
BeD	Beausite gravelly sandy loam, 15 to 30 percent slopes
Ur	Urban land

Figure 21: Web Soil Survey of Project Site.

2. *IMC 18.10.590-760: WETLANDS*

SECTION SUMMARY:
Wetlands B and C, two Category IV wetlands less than 2,500 square feet in size, were identified on the site and evaluated in a Critical Area Study & Wetland Mitigation Plan and addendum prepared by a qualified professional and approved by the City's third-party review consultant. The proposal complies with applicable protection requirements for Wetland B. The proposal will permanently impact Wetland C and will provide off-site mitigation meeting requirements in Chapter 18.10 IMC.

The Applicant submitted a Critical Area Study & Wetland Mitigation Plan prepared by Wetland Resources Inc. revised February 22, 2021 (Attachment 38 – Critical Area Study & Wetland Mitigation Plan). The study identified and investigated Wetlands B and C

(shown in Figure 22, below), one area of concern, and non-wetland areas. The study was reviewed by the City's third-party environmental consultant, Herrera, Inc., and found to be in conformance with critical areas study requirements in the IMC and development standards for wetlands set forth in IMC 18.10.590-760.

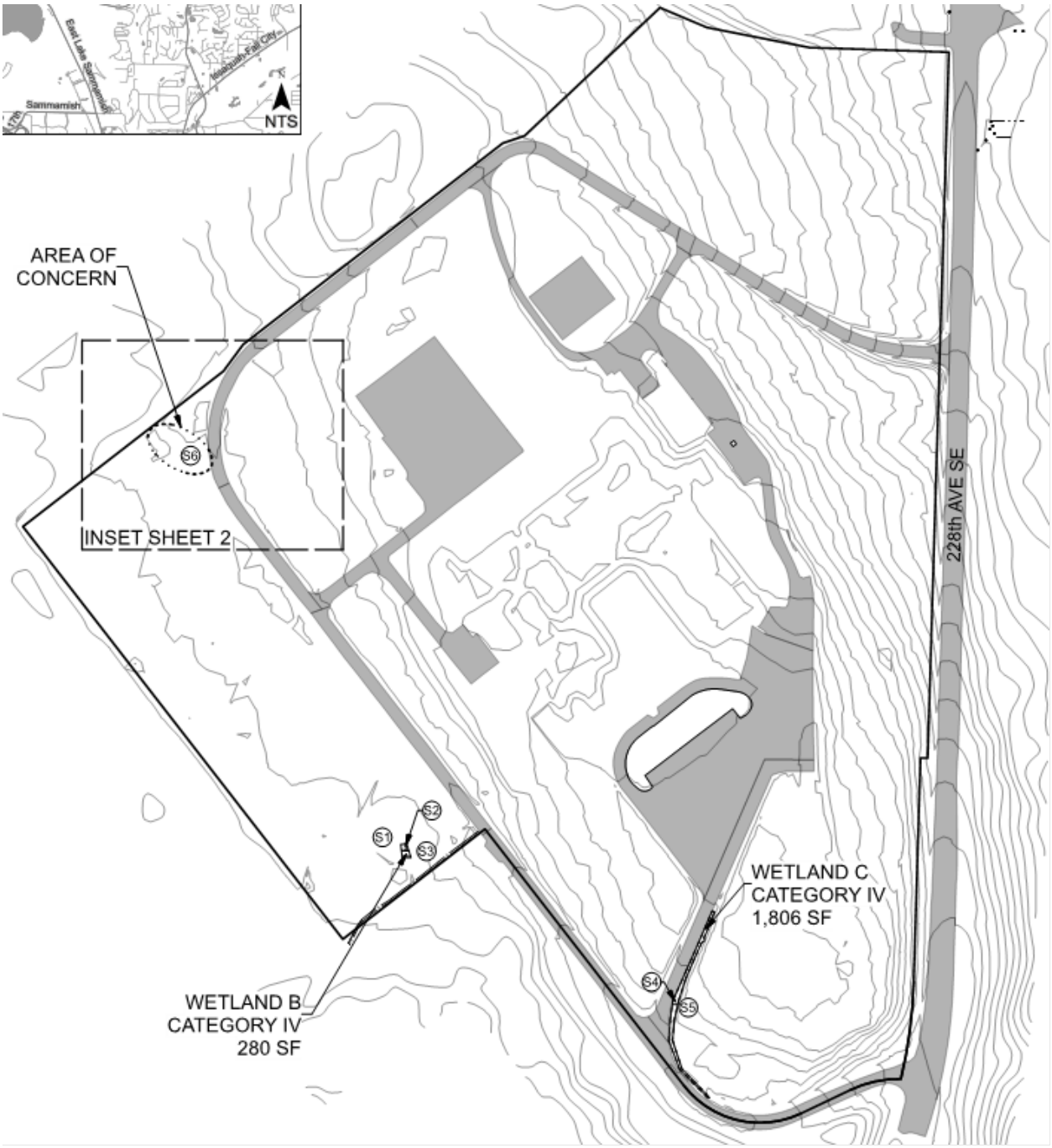


Figure 22: Wetland Features. Source: ISD Application Materials (Attachment 38, Existing Conditions Map – Critical Area Study & Wetland Mitigation Plan).

a. Wetland B

Wetland B is located in the southwestern corner of the property, near the intersection of 224th Lane SE and SE 42nd Terrace at Providence Point, shown in Figure 23, below. Wetland B is a seasonal palustrine wetland classified as a depressional wetland and has a multi-stratum vegetation structure comprising a forested vegetation classification (Attachment 38 – Critical Area Study & Wetland Mitigation Plan). The wetland scored 15 points on the Department of Ecology's Wetland Rating Form for Western Washington, resulting in a Category IV classification per IMC 18.10.620, the lowest classification. The wetland scored four (4) points for habitat functions, which is a low habitat value score. The wetland is approximately 280 square feet in size. Pursuant to IMC 18.10.640(C), Category IV wetlands less than 2,500 square feet in size do not require a buffer. Wetland B and a 50-foot voluntary buffer will be protected in the proposed vegetated buffer area between the school facilities and the Providence Point community. Wetland B will be a site feature for students and visitors viewable from an overlook at the elementary school playground but will not be accessible to students or visitors.

CONCLUSON: The project complies with applicable requirements for Category IV wetlands less than 2,500 square feet in size with respect to Wetland B.

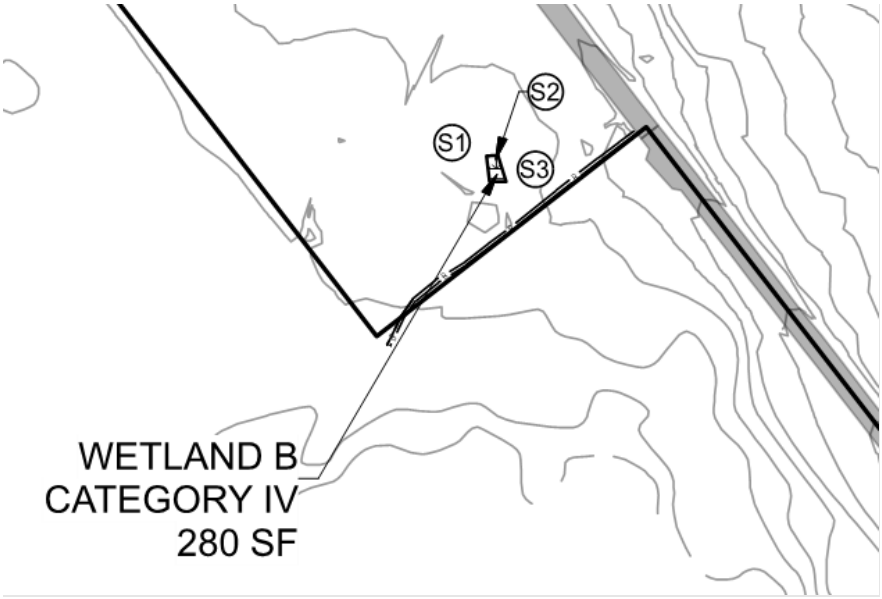


Figure 23: Wetland B. Source: ISD (Attachment 38, Page 63 – Critical Area Study & Wetland Mitigation Plan).

b. Wetland C

Wetland C is located in the southern portion of the property along an existing paved internal access road that will function as a future emergency access to the site, shown in Figure 24, on the following page. Wetland C is a saturated (non-seasonal) palustrine wetland and is described as a non-persistent emergent wetland (Attachment 38 – Critical Area Study & Wetland Mitigation Plan). The wetland

scored 15 points on the Department of Ecology's Wetland Rating Form for Western Washington, resulting in a Category IV classification per IMC 18.10.620. The wetland scored four (4) points for habitat functions, which is a low habitat value score. The wetland is approximately 1,806 square feet in size. Pursuant to IMC 18.10.640(C), Category IV wetlands less than 2,500 square feet in size do not require a buffer.

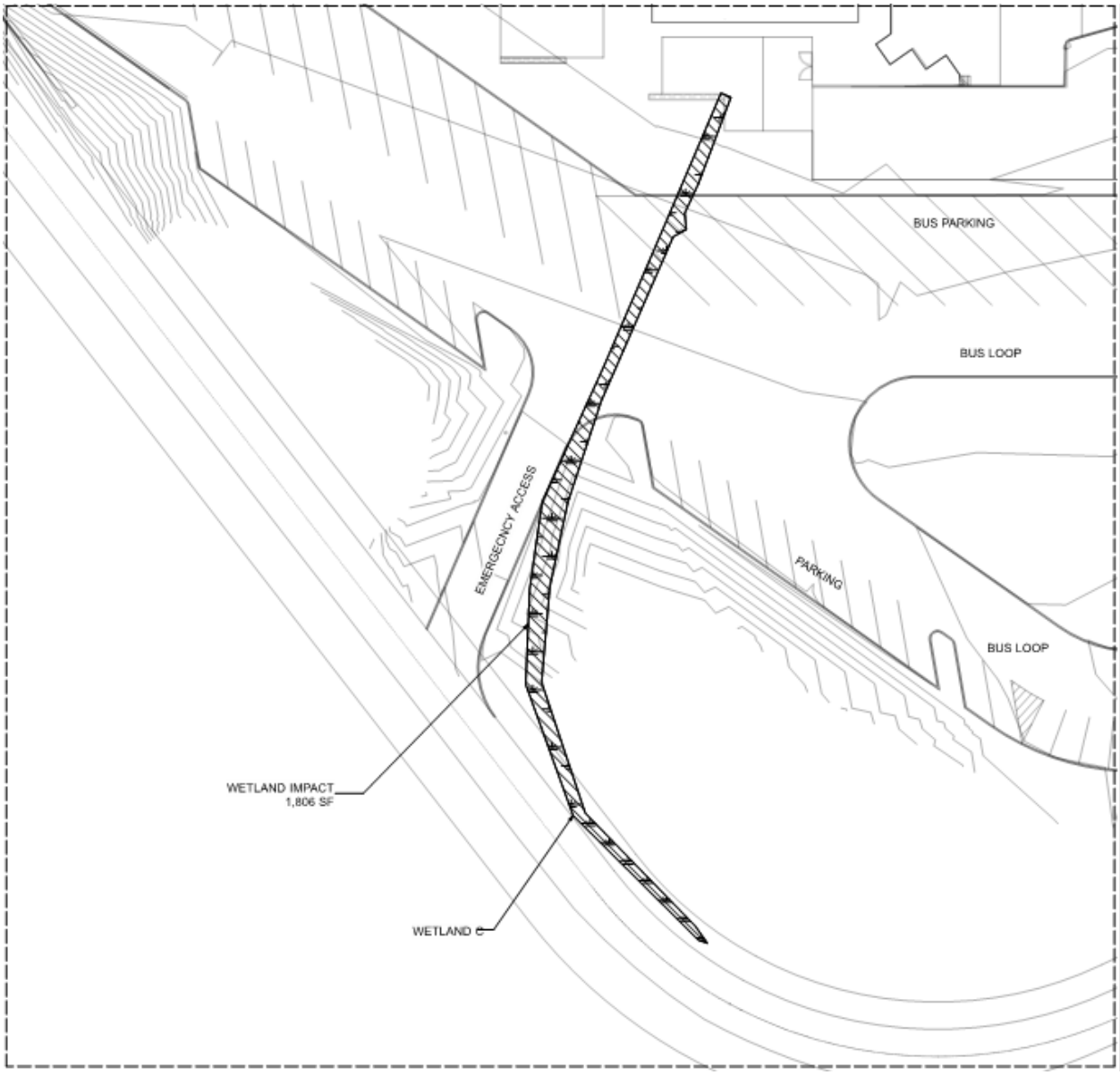


Figure 24: Wetland C and Proposed Impacts. Source: ISD (Attachment 38, Page 66 – Critical Area Study & Wetland Mitigation Plan).

The Applicant proposes to impact Wetland C in its entirety by filling it. Impacts will be permanent, and Wetland C cannot be restored. Development activities in wetlands cannot be authorized unless the Applicant has demonstrated that the impact is both unavoidable and necessary. In Category IV wetlands where non-

water-dependent activities are proposed the Applicant must demonstrate consistency with the criteria in IMC 18.10.700(C)(2), IMC 18.10.700(D), and IMC 18.10.710. The Applicant provided an addendum to the Critical Area Study and Wetland Mitigation Plan to address the criteria for impacting Wetland C (Attachment 40 – Addendum to Critical Area Study & Wetland Mitigation Plan). Herrera, Inc. reviewed and concurred with the addendum (Attachment 41 – Third-Party Peer Review Approval).

The project is consistent with the criteria in IMC 18.10.700(C):

1. *The basic project purpose cannot reasonably be accomplished using one (1) or more other sites in the general region (outside the hydraulic influence area) that would avoid, or result in less, adverse impact on a regulated wetland.*
   Staff Analysis: The Applicant performed a significant alternatives analysis to select the subject property. No other sites meeting Issaquah School District's requirements for providing a comprehensive high school program were available. See Section VII.A.16 of this Staff Report. The proposal complies with this criterion.

2. *The basic purpose of the project cannot be accomplished by reducing the size, scope, configuration, or density of the project, as proposed, and by using any alternative designs of the project, as proposed, that would avoid, or result in less adverse impact on a wetland or its buffer.*
   Staff Analysis: The Applicant has removed desired elements of the site program (practice fields, tennis courts, playgrounds, outdoor learning spaces, and gathering plazas) to fit effectively on the site while preserving a substantial vegetated buffer between the subject property and the adjacent residential neighbors. The basic purpose of the project (providing a comprehensive high school and elementary school with attendant athletic facilities and related site features) cannot be accomplished by further reducing the size, scope, or configuration of the project. The Applicant evaluated alternative designs that were rejected due to site constraints including topography and existing site infrastructure. No other alternatives exist that would result in less adverse impact on a wetland or its buffer while still responding to code requirements and community concerns about tree retention.

3. *In cases where the applicant has rejected alternatives to the project, as proposed, due to constraints such as zoning, deficiencies of infrastructure, or parcel size, the applicant has made reasonable attempt to remove or accommodate such constraints.*
   Staff Analysis: The Applicant has rejected design alternatives due to code requirements, topography, site features, and community comments. The Applicant must provide a secondary emergency access to the site and will use the existing internal access road from Providence Heights Loop to the proposed high school site. Using the existing access preserves as many trees as possible

and limits site grading and disturbance, but improving the existing access for use by emergency response vehicles necessitates filling Wetland C. The Applicant has made reasonable attempts to remove or accommodate such constraints and the proposal balances the desire to protect trees and landforms by eliminating a small wetland with low habitat value.

The Applicant has demonstrated that impacts to Wetland C are unavoidable while achieving the project purpose, providing necessary secondary emergency access, and meeting code requirements and community desires for tree and landform preservation. Development in Wetland C can be authorized if the criteria in IMC 18.10.700(D) are met. The Applicant addressed the following IMC 18.10.700(D) criteria in its supplemental memo (Attachment 40 – Addendum to Critical Area Study & Wetland Mitigation Plan), concurred with by Herrera, Inc. (Attachment 41 – Third-Party Peer Review Approval):

1. *The proposed project is water-dependent or requires access to the wetland as a central element of its basic function, or is not water-dependent but has no practicable alternative pursuant to this section.*
   Staff Analysis: The project is not water-dependent but has no practicable alternative, based on the description above, ISD performed an extensive property search, eliminated programmatic elements, and designed the project to two schools to use its land efficiently. In balancing preservation of trees and landforms and the need to provide safe emergency access, there are no practicable alternatives that would result in retaining all or part of Wetland C. The wetland study documented mitigation sequencing and determined permanent impacts to Wetland C were unavoidable (Attachment 38, Section 9.0 and Attachment 40 – Critical Area Study & Wetland Mitigation Plan and Addendum). The proposal complies with this criterion.

2. *No reasonable use with less impact on the wetland and its buffer is possible (e.g., agriculture, aquaculture, transfer or sale of development rights or credits, sale of open space easements, etc.).*
   Staff Analysis: This is the only site within Issaquah School District's boundaries and targeted enrollment area that can be successfully used as a high school. While the property could conceivably support an alternative use, preventing ISD from developing this property as a school could unreasonably restrict ISD's property rights as there is no reasonable alternative use of the property in the specific area of Wetland C. Wetland C is a roadside ditch that will be impacted due to the need to provide emergency access to the schools and to accommodate operational functions. The bus loop and other site features cannot be relocated while serving the schools adequately and impacts to the upper portion of Wetland C are unavoidable. The required width of the access driveway, turning radius of emergency access vehicles (especially ladder trucks, the longest vehicle operated by Eastside Fire and Rescue), and approach grade needed to be passable for vehicles necessitate improvement of the existing

southerly site access that renders impacts to lower portion of Wetland C unavoidable (Attachment 38, Section 9.0 and Attachment 40 – Critical Area Study & Wetland Mitigation Plan and Addendum). The proposal complies with this criterion.

3. *There is no feasible on-site alternative to the proposed activities, including reduction in density, phasing of project implementation, change in timing of activities, revision of road and lot layout, and/or related site planning considerations, that would allow a reasonable use with less adverse impacts to wetlands and wetland buffer.*
   Staff Analysis: There is no feasible on-site alternative to the proposed activities. The footprint of the campus has been minimized through the reduction of programmatic elements and use of multi-story school buildings. While this reduces the overall impact on the site, the wetland study determined that there is no way to configure the proposed campus without impacting Wetland C (Attachment 38, Section 9.0 and Attachment 40 – Critical Area Study & Wetland Mitigation Plan and Addendum). This is due to the need to provide safe emergency access that is designed with the requisite width, turning radius, and grade to be passable by emergency response vehicles. The proposal complies with this criterion.

4. *The proposed activities will result in minimum feasible alteration or impairment to the wetland's functional characteristics and its existing contours, vegetation, fish and wildlife resources, and hydrological conditions.*
   Staff Analysis: The wetland study documents mitigation sequencing consistent with IMC 18.10.490 (Attachment 38, Section 9.0 and Attachment 40 – Critical Area Study & Wetland Mitigation Plan and Addendum). Avoidance of the impacts is not feasible. Impacts have been minimized across the site by preserving Wetland B and a voluntary 50-foot buffer around it. According to the wetland study, it is not possible to reduce the impact to Wetland C due to its location and linear nature. The proposed impact to Wetland C is the minimum impact necessary to construct the project (Attachment 38, Section 9.0 and Attachment 40 – Critical Area Study & Wetland Mitigation Plan and Addendum). The proposal complies with this criterion.

5. *Disturbance of wetlands has been minimized by locating any necessary alteration in wetland buffers to the extent possible.*
   Staff Analysis: Wetland C is a Category IV wetland less than 2,500 square feet in size and, pursuant to IMC 18.10.640(C), does not have a regulatory buffer. According to the wetland study, it is not possible to reduce the impact to Wetland C due to its location and linear nature. The proposed impact to Wetland C is the minimum impact necessary to construct the project (Attachment 38, Section 9.0 and Attachment 40 – Critical Area Study & Wetland Mitigation Plan and Addendum). The proposal complies with this criterion.

6. *The proposed activities will not jeopardize the continued existence of endangered, threatened, rare, sensitive, or monitor species as listed by the federal government or the state of Washington.*
   Staff Analysis: No threatened or endangered species were identified on the project site (Attachments 38 and 40 – Critical Area Study & Wetland Mitigation Plan and Addendum). The proposed alterations to Wetland C will not jeopardize the continued existence of endangered, rare, sensitive, or monitor species as listed by the Federal government or the State of Washington. The proposal complies with this criterion.

7. *The proposed activities will not cause significant degradation of groundwater or surface water quality.*
   Staff Analysis: Water leaving Wetland C flows into a culvert and under the adjacent internal access road, where it enters a catch basin on the south side of the road and is assumed to enter another storm drain downslope of the access road on the adjacent property (Attachment 38, Section 6.2.2 and Attachment 40 – Critical Area Study & Wetland Mitigation Plan and Addendum). After development, stormwater will be collected in underground detention vaults on the site for quality treatment and controlled discharge (see Section VII.E.1 of this Staff Report). The proposed alterations to Wetland C will not cause significant degradation of groundwater or surface water quality. The proposal complies with this criterion.

8. *The proposed activities comply with all state, local and federal laws, including those related to sediment control, pollution control, floodplain restrictions, and on-site wastewater disposal.*
   Staff Analysis: The Applicant is required to comply with all City of Issaquah, State of Washington, and Federal laws related to sediment control, pollution control, and on-site wastewater disposal. There are no floodplains present on the property and regulations related to floodplains do not apply. The Applicant is required to provide temporary erosion and sediment control during construction, permanent erosion control in the form of landscaping or other treatments that prevent sediment from running off, stormwater treatment, and connection to sanitary sewer for disposal of wastewater. The proposal has demonstrated general conformance to these requirements and/or recommended conditions of approval have been included with this Staff Report to ensure conformance **(Conditions 19, 27, 29-30, 32-33, 43-45, and SEPA conditions 1, 3-9, 14-20, 30-36)**. Verification of compliance will occur with construction permit review. The proposal complies with this criterion.

9. *Any and all alterations to wetlands and wetland buffers will be mitigated as provided in IMC 18.10.750.*
   Staff Analysis: The Applicant has proposed mitigation consisting of the purchase of 0.04 credits from the East Lake Sammamish Mitigation Bank (ELSMB) (Attachment 38, Section 10.0 – Critical Area Study & Wetland Mitigation Plan). The ELSMB was chosen because it is close to the project site and in the same watershed as Wetland C. This credit represents a 1:1 mitigation ratio for the impact of 1,806 square feet (0.04 acre) of Wetland C. Through the purchase of approved credits, all functions and values lost through impacting Wetland C will be replaced within the East Lake Sammamish Basin watershed (Attachment 38, Section 8.3 – Critical Area Study & Wetland Mitigation Plan). The US Army Corps of Engineers has reviewed and approved the proposed mitigation bank use plan and mitigation ratio (Attachment 38, Section 10.0 – Critical Area Study & Wetland Mitigation Plan). The proposal complies with this criterion.

10. *There will be no damage to nearby public or private property and no threat to the health or safety of people on or off the property.*
    Staff Analysis: Impacts to Wetland C are not anticipated to damage nearby public or private property or threaten the health or safety of people on or off the property. The proposal complies with this criterion.

11. *The inability to derive reasonable use of the property is not the result of actions by the applicant in segregating or dividing the property and creating the undevelopable condition after the effective date of the ordinance codified in this chapter.*
    Staff Analysis: The Applicant did not segregate or divide the property. The proposal complies with this criterion.

Pursuant to IMC 18.10.720(B)(3), Category IV wetlands less than 2,500 square feet in size that are not part of a wetland complex may be altered if mitigation is provided to demonstrate no net loss of functions or values. This section also establishes criteria for alterations. The Applicant addressed alteration in the Critical Area Study and Wetland Mitigation Plan (Attachment 38), which Herrera, Inc. concurred with (Attachment 40). The project is consistent with the alteration criteria as follows:

1. *Preserve the wetland or demonstrate through mitigation sequencing that avoidance or minimization of impacts have been considered; or*
   Staff Analysis: The *Critical Area Study & Wetland Mitigation Plan* provides a mitigation sequencing analysis consistent with IMC 18.10.490. According to the study, avoidance and minimization of impacts to Wetland C are not possible and the proposed impacts to Wetland C are the minimum necessary to construct the combined elementary and high school campus. This mitigation alternative is not feasible (Attachment 38, Section 10.0 and Attachment 40 – Critical Area Study & Wetland Mitigation Plan and Addendum).

2. *Relocate the wetland on site by creating, re-establishing, or rehabilitating a new, equal-sized wetland; or*
   Staff Analysis: Relocating the wetland on site is not possible due to a lack of natural hydrology source. Expanding the existing Wetland B would require removal of existing mature trees and understory vegetation, reducing the number of significant trees on the site and reducing the wildlife habitat quality in the area around Wetland B. This mitigation alternative is not feasible (Attachment 38, Section 10.0 – Critical Area Study & Wetland Mitigation Plan).

3. *Enhance an equal area of another existing wetland on site, demonstrating equivalent or greater functions; or*
   Staff Analysis: Wetland B is significantly smaller than Wetland C and would not meet size requirements for enhancing an equal area of another existing wetland on site. No other wetlands of equal area exist on the site. This mitigation alternative is not feasible (Attachment 38, Section 10.0 – Critical Area Study & Wetland Mitigation Plan).

4. *Protect significant on-site trees. Protect an area of significant trees equal to the wetland area or enhance an equal upland area with native tree planting. This shall not apply to areas already protected as critical area buffers and shall be in addition to tree retention requirements; or*
   Staff Analysis: The Applicant has applied for a modification to reduce tree retention requirements, indicating that meeting the minimum 25 percent tree retention requirements is not possible (see Section VII.A of this Staff Report). Because the project does not anticipate meeting the base tree retention requirements, protecting an area of significant trees equal to the area of Wetland C in addition to the tree retention requirements is not possible. This mitigation alternative is not feasible.

5. *Off-site mitigation opportunities may be considered.*
   Staff Analysis: The Applicant is proposing off-site mitigation by purchasing wetland mitigation bank credits from the East Lake Sammamish Mitigation Bank (ELSMB). The ELSMB is a 15 square mile certified mitigation bank project located in Water Resource Inventory Area (WRIA) 8. The ELSMB is restricted to public agency use and was jointly developed by King County and Sammamish Plateau Water and Sewer District. Mitigation credit ratios at the ELSMB have not been set and the Applicant is proposing a 1:1 impact to credit ratio for this project, resulting in the purchase of 0.04 credits from the ELSMB. The *Critical Area Study & Wetland Mitigation Plan* indicates that this ratio is adequate to compensate for the loss of functions and values from impacts to Wetland C within the watershed basin (Attachment 38, Section 10.0 – Critical Area Study & Wetland Mitigation Plan).

CONCLUSION: The Applicant has met the burden to demonstrate that impacts to Wetland C are unavoidable and has proposed adequate mitigation to offset the loss of Wetland C's functions and values. The proposal complies with applicable criteria to approve alterations to Wetland C. The proposal to purchase ELSMB credits is the mitigation plan required pursuant to IMC 18.10.750, and verification of the purchase is required prior to issuing construction permits for the project. **[CONDITION 31]**

c. Areas of Concern

During third-party peer review of the *Critical Area Study & Wetland Mitigation Plan* by Herrera, Inc., a potential wetland area in the northwest portion of the site was identified by standing water and hydrophytic vegetation (see Figure 25, below). Further site investigation by Wetland Resources, Inc. determined that this area of concern is not a wetland.

CONCLUSION: The area of concern is not a wetland. No further investigation is required.

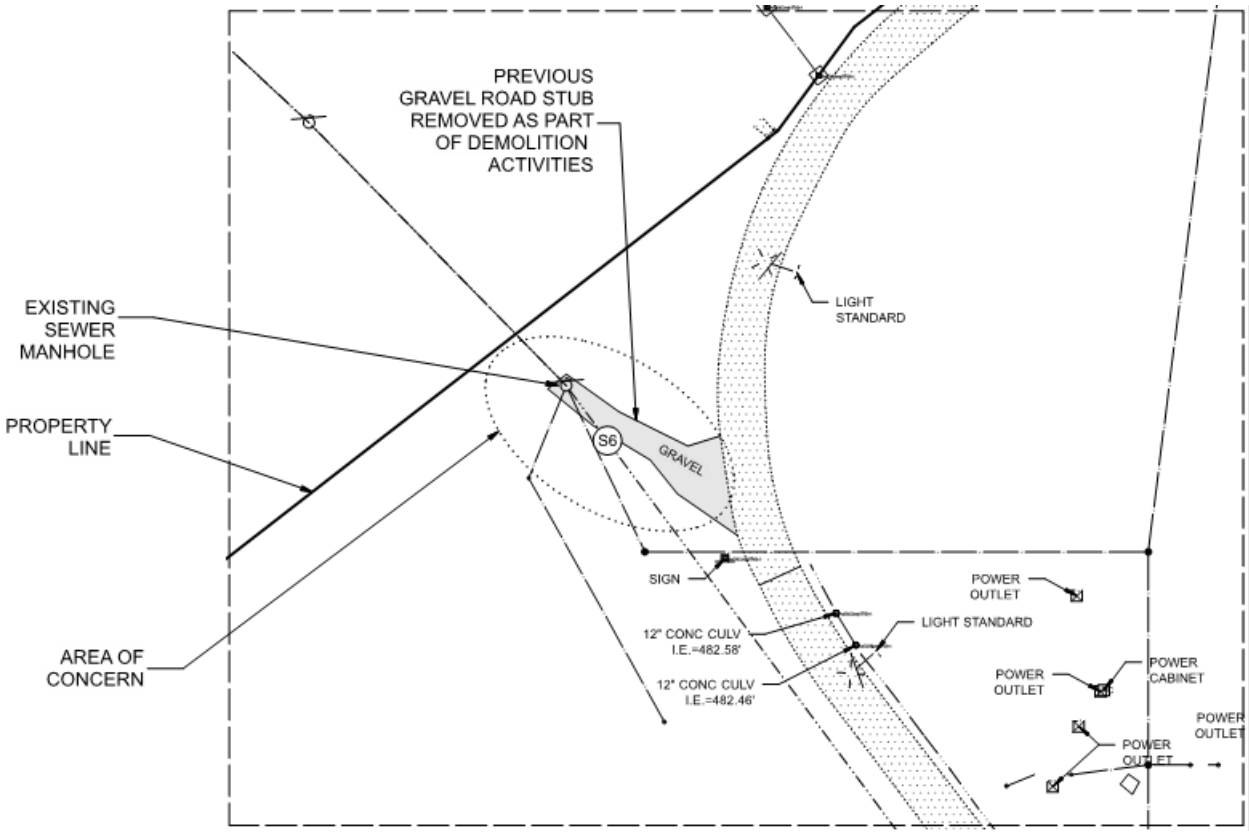


Figure 25: Area of Concern. Source: ISD (Attachment 38, Page 64 – Critical Area Study & Wetland Mitigation Plan).

d. Wildlife

The report also investigated the site for use by wildlife species and determined that the on-site critical areas provide low-quality wildlife habitat due to their small size

and disturbance created by nearby development (Attachment 38, Section 7.0 – Critical Area Study & Wetland Mitigation Plan). No threatened or endangered species were observed on the site during site visits. Further investigation is not required.

CONCLUSION: This information is provided for context and assistance in decision making. There are no applicable wildlife requirements in Chapter 18.10 IMC.

e. Performance Standards

Development on sites with a wetland must comply with the performance standards in IMC 18.10.660:

1. Lighting must be directed away from the wetland and meet the outdoor lighting standards for spillover into critical areas in IMC 18.07.107.
2. Activities that generate noise must be located away from the wetland, or noise impacts must be minimized through design or insulation techniques.
3. Toxic runoff from new impervious surface area must be directed away from wetlands.
4. Treated stormwater runoff may be allowed into wetland buffers. Channelized flow should be prevented.
5. Use of pesticides, insecticides and fertilizers within one hundred fifty (150) feet of wetland boundary must be limited and follow best management practices.
6. The outer edge of the wetland buffer must be planted with dense vegetation and/or fencing to limit pet and human disturbance.

Buildings and facilities are generally oriented away from Wetland B and lighting will be directed away from the wetland. Noise-generating activities will also be located away from the wetland, toward the center of the site. Runoff from new impervious surfaces will be collected, treated, and discharged from new detention facilities meeting applicable stormwater requirements (see Section VII.E.1 of this Staff Report for additional information); stormwater discharge will not be directed toward Wetland B. The Applicant will be required to comply with pesticide, insecticide, and fertilizer best management practices for maintenance of landscaping areas within 150 feet of Wetland B. **[CONDITION 32]** Wetland B will be inaccessible and vegetation or fencing is not required.

CONCLUSION: As conditioned, the proposal complies with applicable performance standards.

IMC 18.10.590-760 CONCLUSION: The proposal meets applicable requirements for protecting Wetland B. As conditioned, the proposal meets applicable requirements for impacting and mitigating said impacts to Wetland C.

3. *IMC 18.10.796: CRITICAL AQUIFER RECHARGE AREA (CARA)*

A Class 3 critical aquifer recharge area (CARA) is present on and near the site, shown in Figure 26, below. The project will not have a probable significant adverse impact on the Class 3 CARA and former CPD Director Niven waived the requirement for a critical areas study for this specific feature pursuant to IMC 18.10.410(B), consistent with City policies for CARAs.

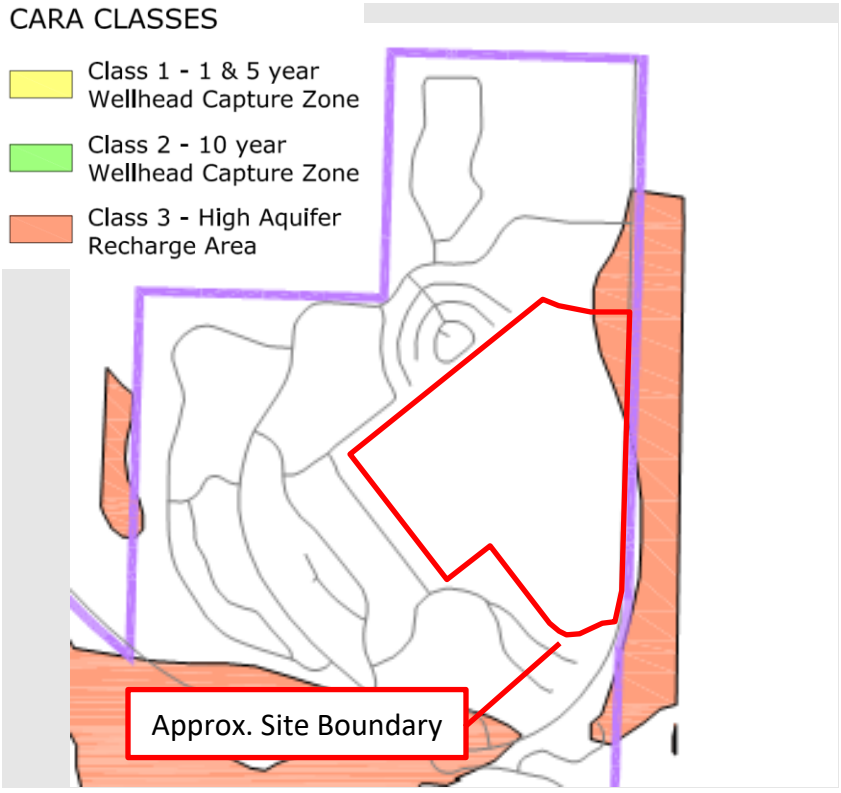


Figure 26: Excerpt from City of Issaquah's Critical Aquifer Recharge Area Classification Map.[60] Annotations provided by Staff. Class 3 CARAs are mapped based on surficial geology of soil units with high to moderate susceptibility to contamination.

Pursuant to IMC 18.10.796(C)(3), Class 3 CARAs include those mapped areas outside of wellhead protection zones that are identified as high aquifer recharge potential areas based on surface geology characteristics and soil types. Development in Class 3 CARAs must adhere to best management practices for protecting groundwater quality set forth in Chapter 13.29 IMC. **[CONDITION 33]** Infiltration is not recommended for this site (Attachment 42 – Geotechnical Report) and requirements for infiltration in Chapter 13.28 will not be required.

[60] Available to view online at: https://www.issaquahwa.gov/DocumentCenter/View/39

IMC 18.10.796 CONCLUSION: The proposal is consistent with development requirements for Class 3 CARAs.

SECTION VII.B ENVIRONMENTALLY CRITICAL AREAS CONCLUSON: Based on the foregoing analysis, and as conditioned, the proposal is consistent with applicable requirements and review criteria for work in, adjacent to, and near critical areas. The project proposes permanent impacts to Wetland C and will provide adequate mitigation.

C. Other Title 18 Requirements

1. IMC 18.07.110: ACCESSORY STRUCTURES

SECTION SUMMARY:

The proposal includes a wide variety of accessory structures supporting each school. This section focuses on structures with identified impacts, including: the proposed stadium complex (track and field, grandstands, bleachers, and scoreboard), ball field complex (softball field, baseball field, batting cages, and gathering plaza), elementary school playground, tennis courts, mechanical equipment, retaining walls, and nonmotorized pathways. The proposed accessory structures meet applicable design and dimensional requirements, including specific requirements for buildings (as opposed to non-building structures).

Uninhabitable accessory structures are subject to the approval criteria in IMC 18.07.110. The Applicant has proposed a number of uninhabitable accessory structures throughout the site, including retaining walls, athletic facilities, playground/recess facilities, and related structures. Dimensional standards for accessory buildings and structures are set forth in IMC 18.07.110(B)(1)-(5); mechanical equipment, retaining walls, and pathways have additional requirements in IMC 18.07.110(B)(7), (9), and (10), respectively. The applicable dimensional requirements for accessory *buildings* are summarized in Table 12, on the following page.

Table 12: Accessory Building Dimensional Requirements.

Standard	Requirement
Height	65 feet[61]
Setback – Front	N/A[62]
Setback – Side and Rear	6 feet, 7 feet, or 20 feet[63]
Setback – Principal Building	6 feet[64]
Setback – Right-of-Way, Access Easement, Private Road	10 feet[65]
Impervious Surface	Included in the calcs for the lot per IMC 18.07.110(B)(5)

Any building that has a floor area exceeding 200 square feet and minor structural elements that equal or exceed 30 inches above finished grade require a building permit per IMC 18.07.110(B)(2) and IMC 18.07.110(B)(10). The Applicant will be required to obtain a building permit prior to beginning construction on any accessory buildings exceeding 200 square feet and/or minor structural elements equal to or exceeding 30 inches above finished grade.

This section of the staff report will analyze accessory structures in groups based on location. A separate section is included to discuss mechanical equipment, retaining walls, and pathways. Note that noise and lighting are addressed separately in Sections VII.C.2 and VII.C.3, below.

a. Stadium, Grandstands, Bleachers, and Scoreboard

The Applicant is proposing a centrally-located stadium with athletic field, walking track, home team grandstands, visiting team bleachers, scoreboard, and associated ticket booth, shown in Figure 27, on page 119 of this Staff Report. The stadium will be lit, see Section VII.C.2 of this Staff Report for additional information.

Track and Field

The track and field will be flat and just below the grade elevation of the pedestrian plaza to the south (Attachment 97, Sheet C1.0LU – Civil Plans). The track and inner-track areas to the north and south will be surfaced with synthetic track surfacing material. The field will be surfaced with a synthetic turf material (Attachment 99, Sheet L2.4LU – Landscape Plans). Netting is proposed at the north and south ends of

[61] IMC 18.07.110(B)(1) applies to residential zones. Because the property is zoned CF-F, not a residential zone, the height limitations in the CF-F zone apply to accessory structures.
[62] Pursuant to IMC 18.07.480(E), there is no front setback for school buildings in the CF-F zone. IMC 18.07.110 does not include any restrictions.
[63] Side and rear setbacks are explained in further detail in Section VII.A of this Staff Report. The setback varies based on the classification of the property line and the adjacent zoning district. See also IMC 18.07.110(B)(4)(a).
[64] See IMC 18.07.110(B)(4)(b).
[65] See IMC 18.07.110(B)(4)(c).

the field to ensure play activities and equipment remain on the field. The stadium complex will be enclosed with fencing for safety and security (Attachment 99, Sheet L1.8LU – Landscape Plans) as follows:

- Eight-foot-high decorative fencing at the south and southeast, where pedestrian activity is anticipated to be highest.
- Six-foot-high black vinyl coated chain link around the north and northeast exterior of the track, on top of the proposed retaining wall.
- Four-foot-high black vinyl coated chain link around the remaining exterior of the track.

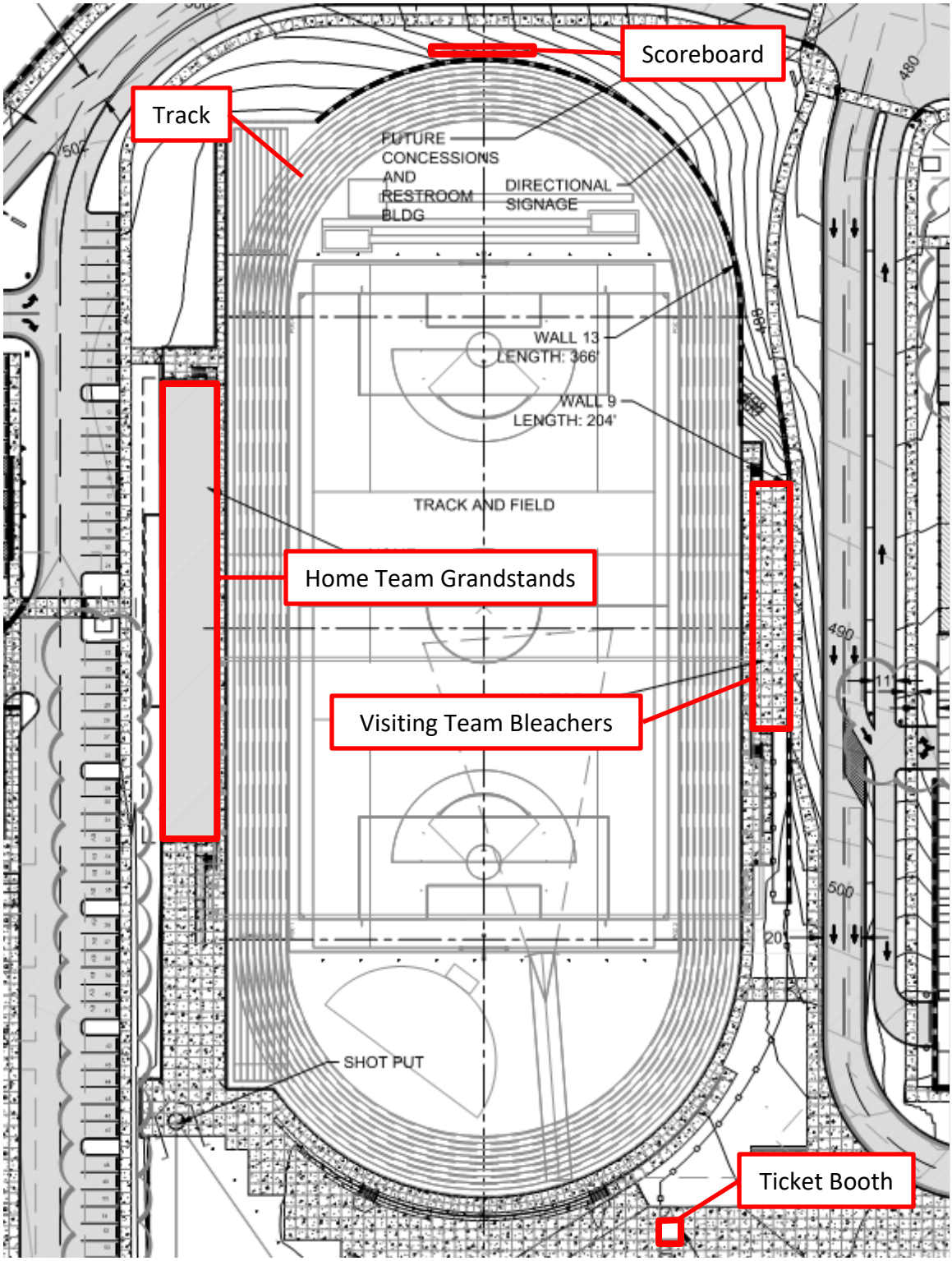


Figure 27: Stadium, Field, Track, and Related Structures. Annotations provided by Staff. Source: ISD Application Materials (Attachment 97, Sheet C1.0LU – Civil Plans).

Home Team Seating

The home team grandstands will include covered bleacher seating and a press box. The cover is a shed roof building that is partially open on both sides; walls are finished with metal wall panels around the back and portions of the sides (Figure 28, below). The building is approximately 34 feet high from the finished grade to the highest point of the shed roof. The home team grandstands, located in the center of the campus, meet applicable setback requirements, are located further than six feet from the principal school buildings, and are located greater than 10 feet from the internal access roadways.

Visitor Seating

Visiting team bleachers will be uncovered metal bench seating, the underside of which is enclosed with a metal wall panel on the sides and back (Figure 28, below). The bleachers include a back panel for safety. The maximum height from the finished grade to the top of the back panel is approximately 13 feet. The bleachers are located in the center of the campus and meet applicable setback requirements, are located further than six feet from the principal school buildings, and are located greater than 10 feet from the internal access roadways.

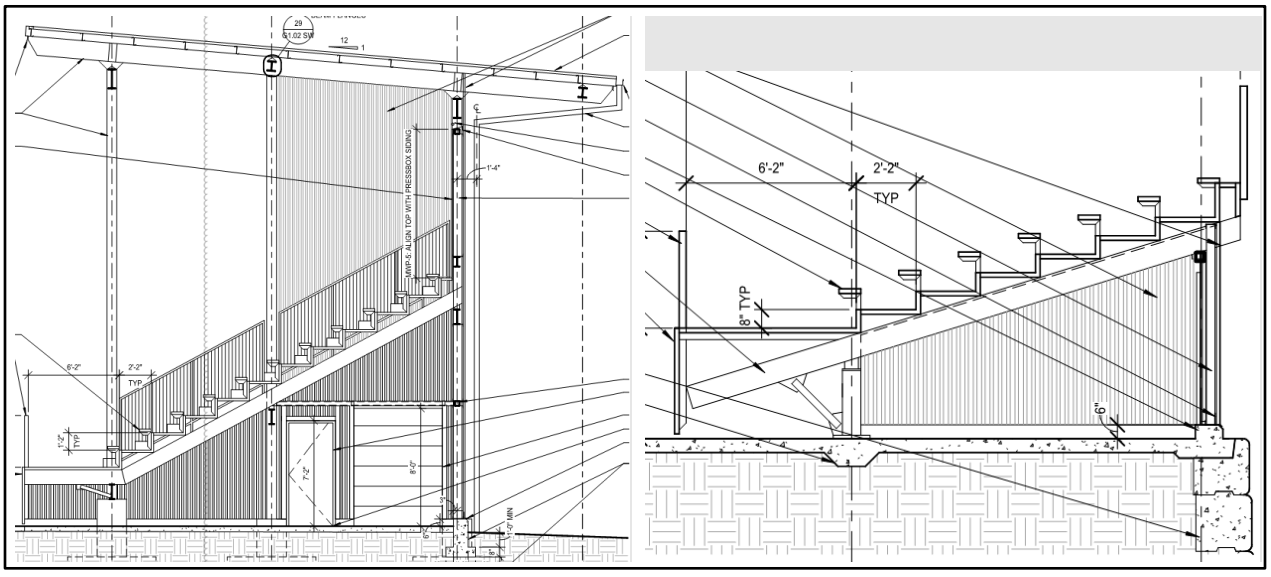


Figure 28: (Left) Home Team Grandstands, (Right) Visitor Bleachers.
Source: ISD Application Materials (Attachment 98 – Architectural Plans & Building Elevations).

Scoreboard

The Applicant is proposing a scoreboard north of the north end of the track, facing southward into the campus (Figure 29, on the following page). The proposed scoreboard will be approximately 27.7 feet high and approximately 44.2 feet wide. The scoreboard will be comprised of four electronic display panels of different sizes for displaying game information. The display area will be approximately 44.2 feet

wide by 12.7 feet high, or 561.3 square feet. The display will be supported by steel posts. The scoreboard is located in the center of the campus and meets applicable setback requirements, is located further than six feet from the principal school buildings, and is located greater than 10 feet from the internal access roadways.

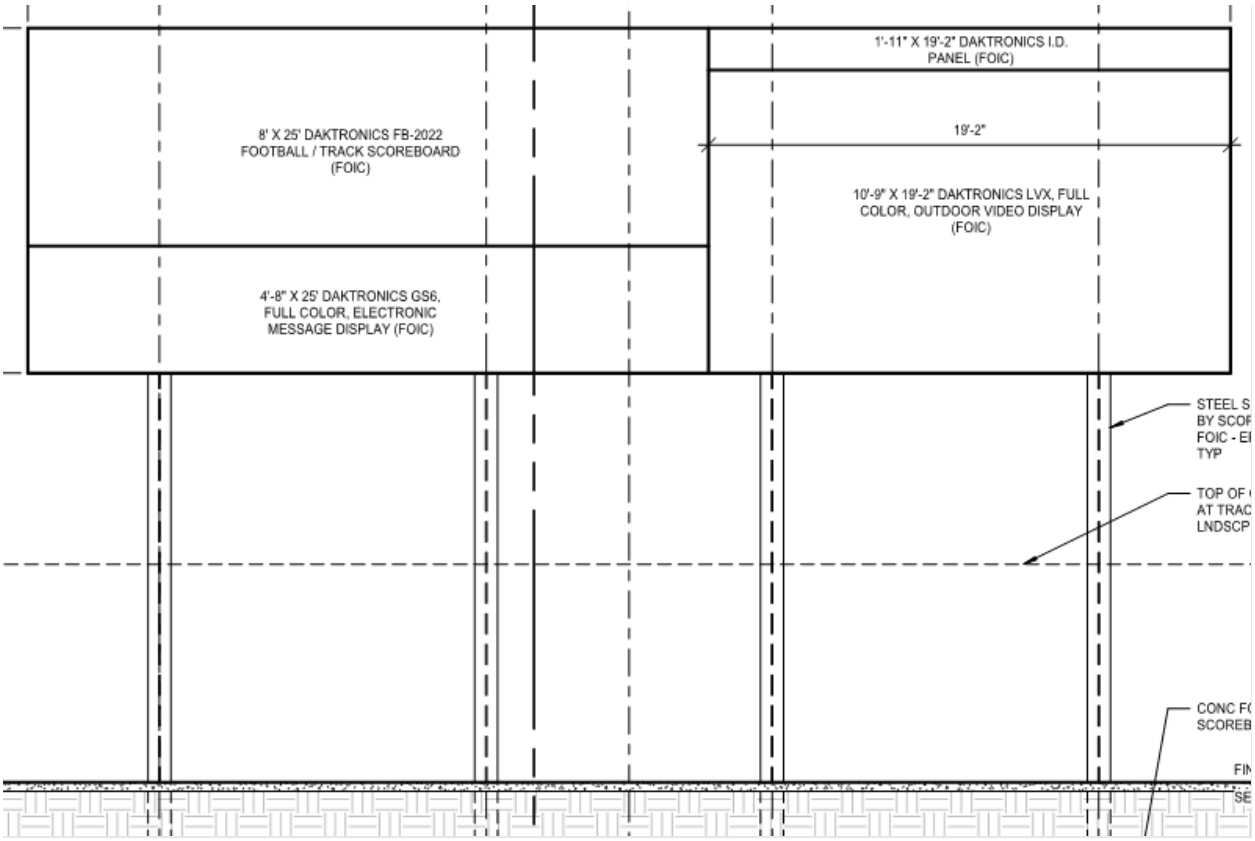


Figure 29: Track and Field Scoreboard. Source: ISD Application Materials (Attachment 98 – Architectural Plans & Building Elevations).

Ticket Booth

The Applicant has proposed a ticket booth located between the track and the high school building. The proposed ticket booth will be approximately 127 square feet and approximately 11.5 feet in height. The ticket booth complies with applicable setback requirements, is located further than six feet from the principal school buildings, and is located further than 10 feet from internal access roads.

STADIUM COMPLEX CONCLUSION: The stadium complex meets applicable dimensional requirements for accessory structures.

b. Ball Field Complex

The Applicant is proposing a ball field complex comprised of a baseball field, softball field, scoreboards, spectator bleachers, batting cages, and portable restrooms, shown in Figure 30, below. The Applicant has also identified the location of a future concessions and restroom building. The ball field complex is located north of the entry boulevard at the main intersection approaching the school. The ball fields are joined by a pedestrian plaza at the infields and play is oriented toward the property line. The ball field complex will not be lit, see Section VII.C.2 of this Staff Report for additional information.

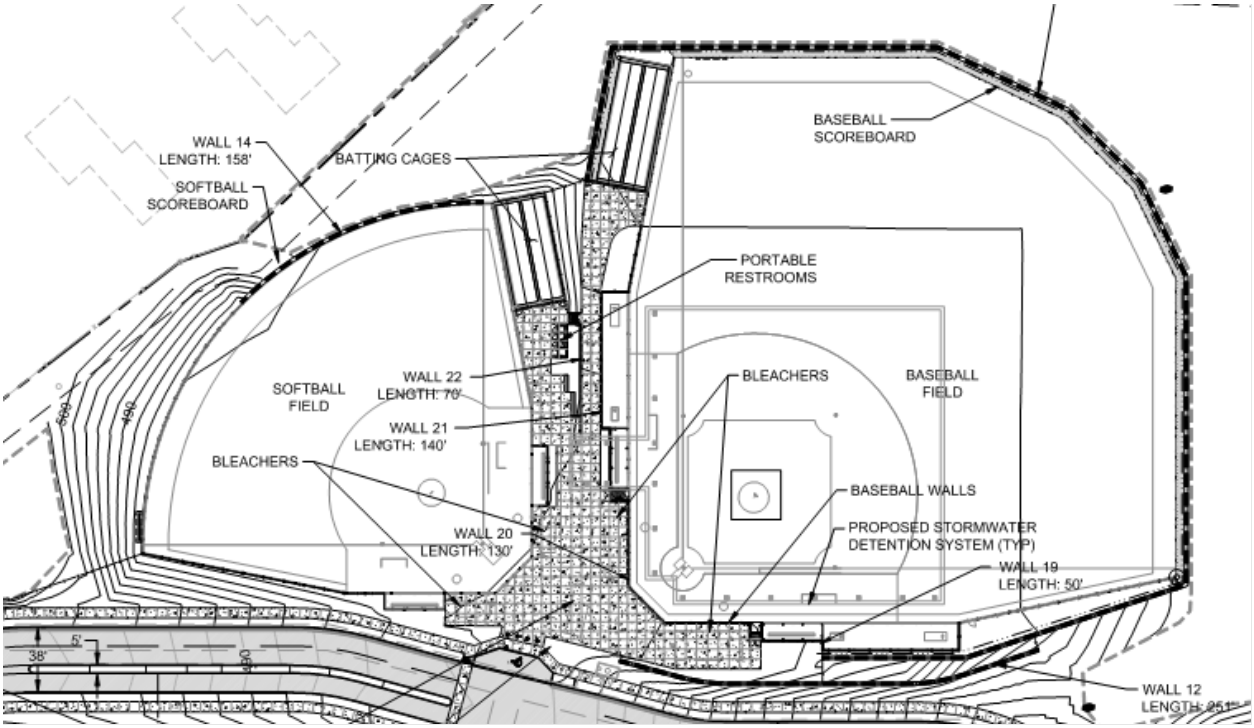


Figure 30: Ball Field Complex. Source: ISD Application Materials (Attachment 97, Sheet C1.0LU – Civil Plans)

Baseball Field, Softball Field, Bleachers, and Scoreboards

The baseball and softball fields will be surfaced with synthetic turf (infield) and sand-based natural playfield (outfield). The outfields will be enclosed with an eight-foot-high black vinyl coated chain link fence with netting and windscreen. The infields will be enclosed with 25-foot and 32-foot black vinyl coated chain link backstops. Bleachers will be located at the west and south sides of the baseball infield and at the east and south sides of the softball infield. A scoreboard will be located at each outfield and will be approximately 19 feet high. The scoreboards will be oriented to face inward toward the infield and bleachers.

Batting Cages

The Applicant has proposed batting cages at the northernmost end of the ball field pedestrian plaza. The batting cages will be enclosed with six-foot-high black vinyl coated chain link fencing and 13-foot-high netting.

Portable Restrooms

The Applicant is proposing to locate four portable restroom buildings in the center of the pedestrian plaza.

None of the accessory structures in the ball field complex meet the definition to be considered buildings. Nevertheless, they comply with applicable height and setback requirements, including being located at least six feet from the principal buildings and at least 10 feet from the internal access roadways.

BALL FIELD COMPLEX CONCLUSION: The ball field complex meets applicable dimensional requirements for accessory structures.

c. Elementary School Playground

The elementary school playground is a flat surface with a combination of paved and unpaved play areas (Figure 31, below).

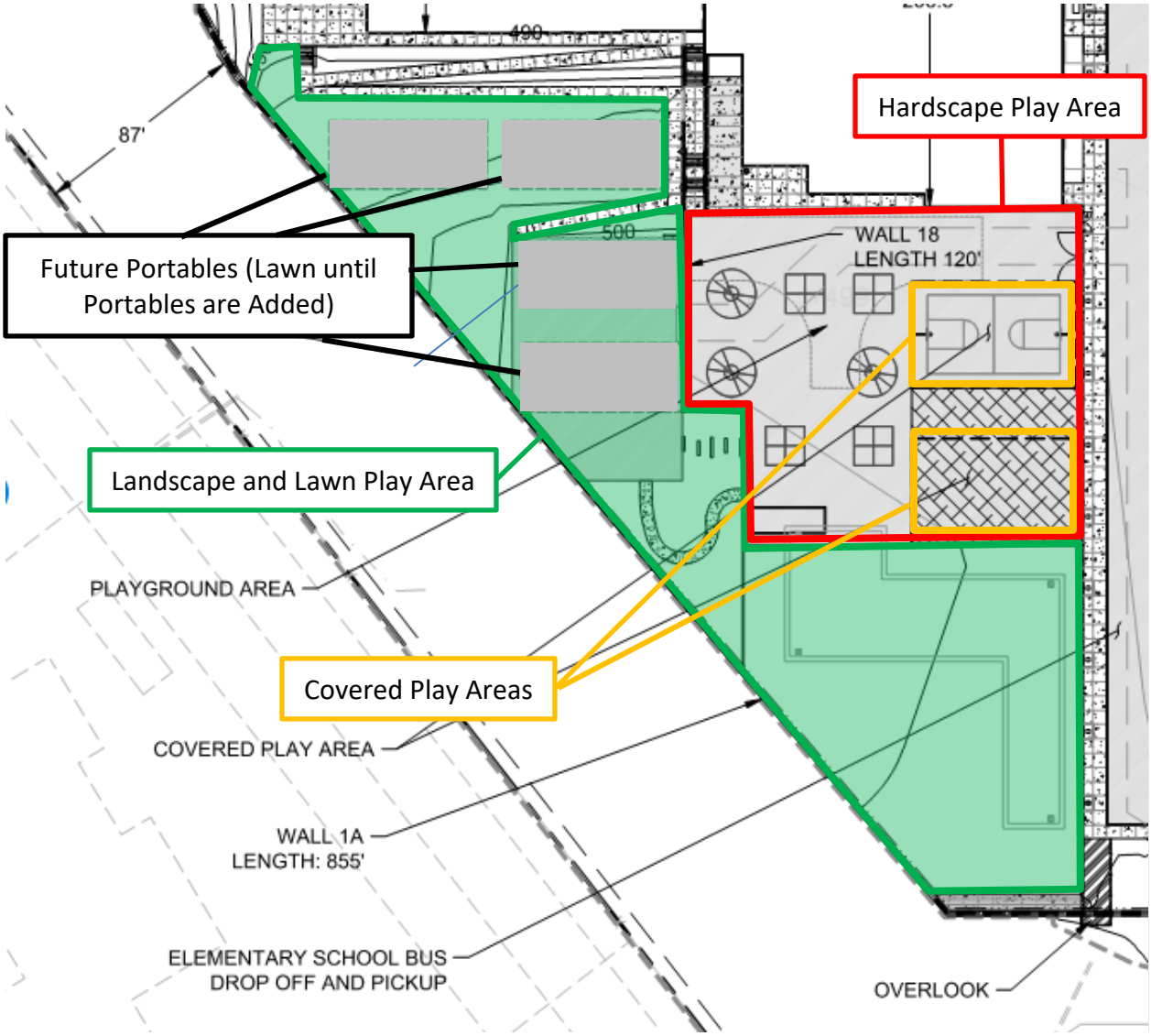


Figure 31: Elementary School Playground. Annotations provided by Staff. Source: ISD Application Materials (Attachment 97, Sheet C1.0LU – Civil Plans).

Paved areas include painted game markings and two covered play areas. The cover structures are open-sided shed-roof buildings that are approximately 25.5 feet high and approximately 2,915 square feet in area (67 feet long by 43.5 feet wide) (Figure 32, on the following page).

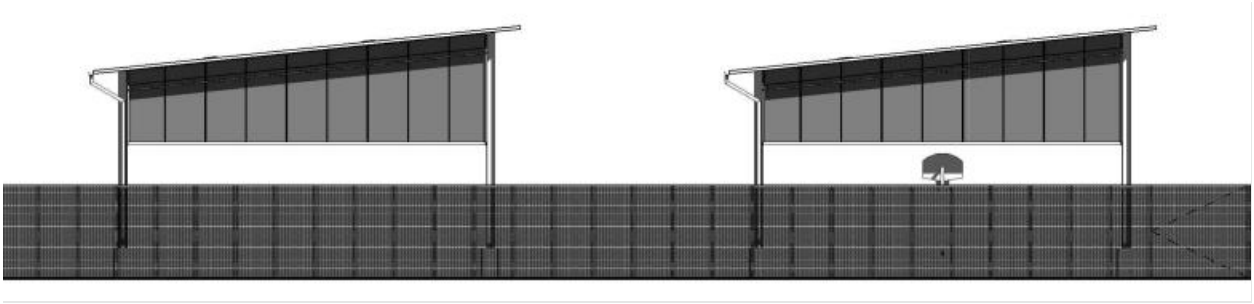


Figure 32: Elementary School Covered Play Areas (behind fencing). Source: ISD Application Materials (Attachment 98 – Architectural Plans & Building Elevations).

The cover structures comply with applicable height and setback requirements, including being located at least six feet from the principal buildings and at least 10 feet from the internal access roadways.

ELEMENTARY SCHOOL PLAYGROUND CONCLUSION: The elementary school playground meets applicable dimensional requirements for accessory structures.

d. Tennis Courts

The applicant is proposing four tennis courts at the north end of the parking structure, accessed through the top level of the parking structure (Figures 33 and 34 on the following page). The tennis courts will be lit, see Section VII.C.2 of this Staff Report for additional information.

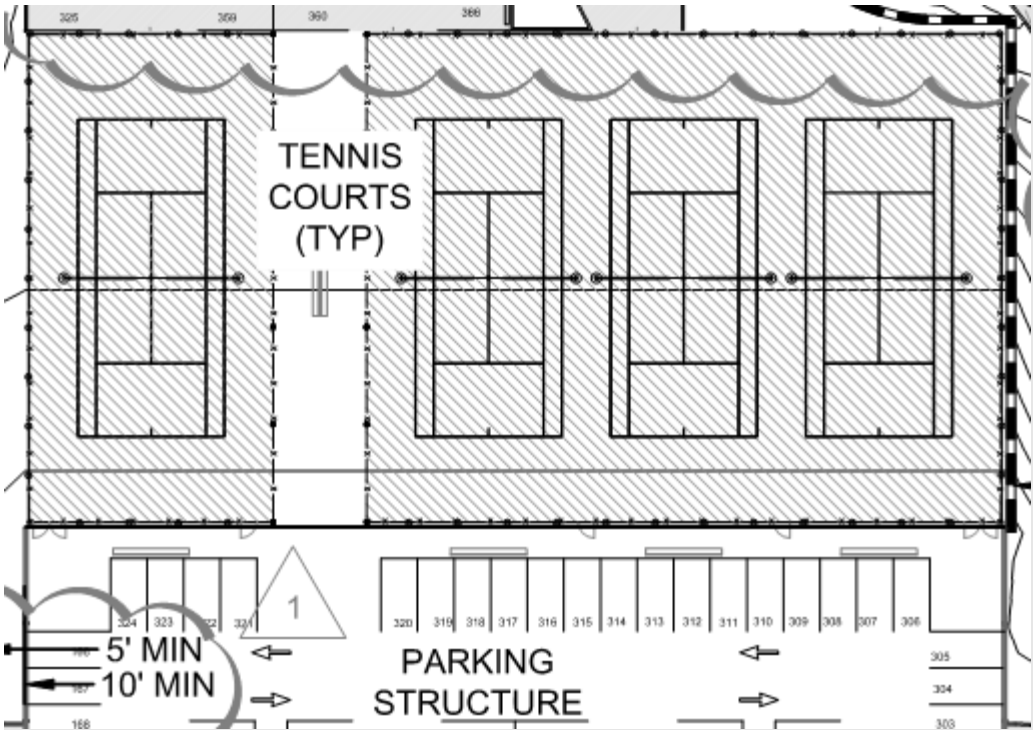


Figure 33: Tennis Courts at North End of Parking Structure. Source: ISD Application Materials (Attachment 97, Sheet C1.0LU – Civil Plans).

Pedestrians will walk through a canopy-covered walkway from the high school directly north to the tennis courts.

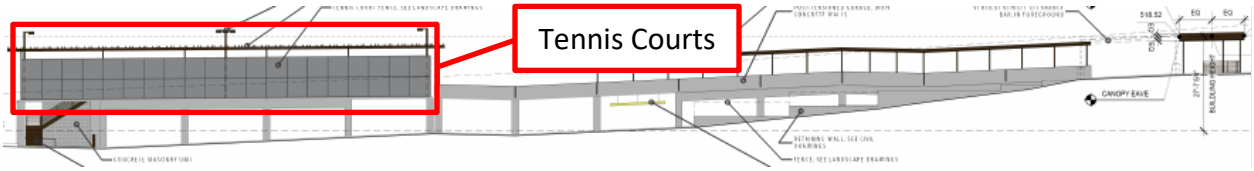


Figure 34: Parking Garage West Elevation. Annotations provided by Staff. Source: ISD Application Materials (Attachment 98 –Architectural Plans & Building Elevations).

The tennis courts will be enclosed with 12-foot-high black vinyl coated chain link fence with windscreen (Attachment 99, Sheet L18LU – Landscape Plans). The parking structure, including tennis courts and fencing, will be approximately 27.6 feet above average grade, consistent with requirements for building height. The tennis courts also comply with applicable setback requirements, including location at least six feet from the principal buildings and at least 10 feet from internal access roads.

TENNIS COURTS CONCLUSION: The tennis courts meet applicable dimensional requirements for accessory structures.

e. Mechanical Equipment

Permanent mechanical equipment is required to meet accessory structure setbacks per IMC 18.07.110(B)(7). Most of the proposed mechanical equipment is roof-mounted and meets applicable setback requirements based on the location of the buildings (see Section VII.A of this Staff Report) (see Figures 35 and 36, below and on following page). A generator, trash compactor, and transformer at the high school are ground-mounted and located in the utility enclosure on the south side of the building, set back over 200 feet from any property line. A transformer at the elementary school is ground-mounted and located in the utility enclosure on the east side of the building, set back over 188 feet from any property line.

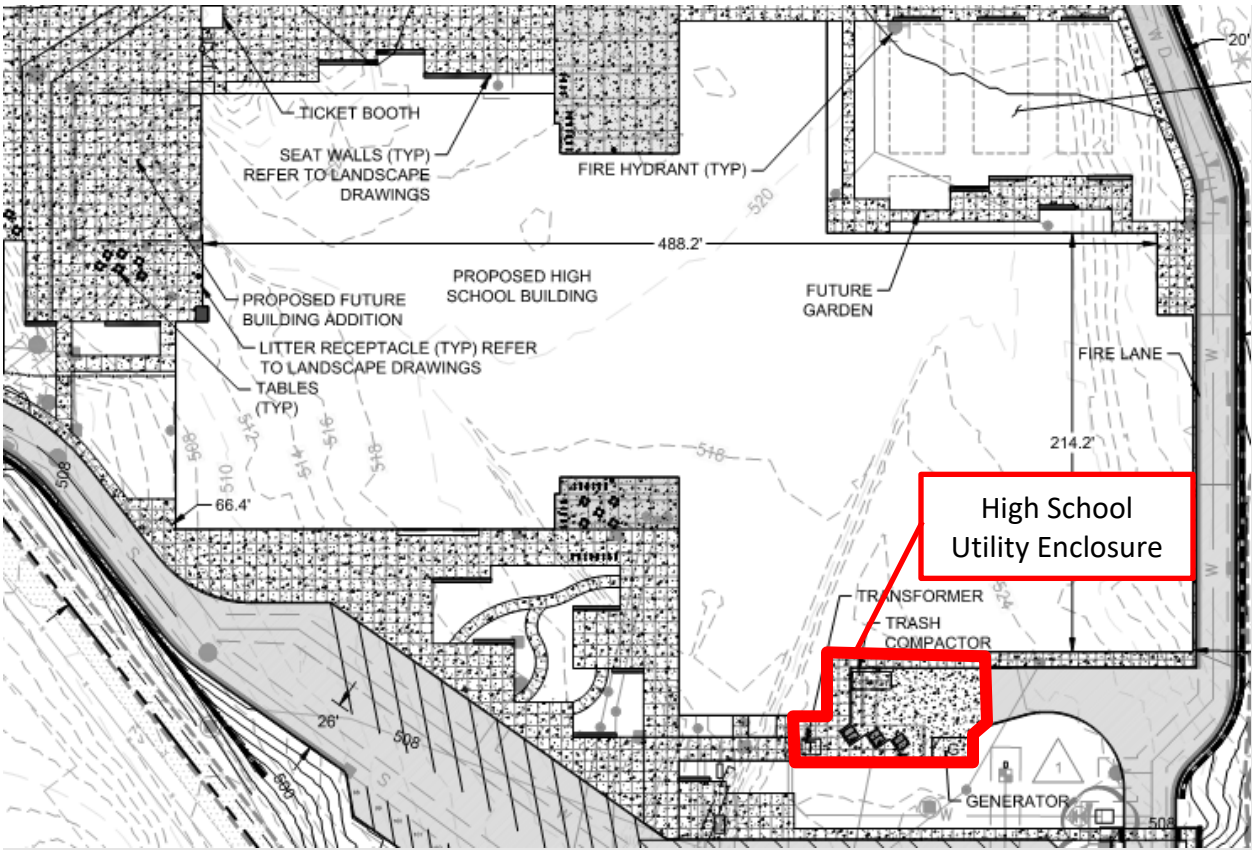


Figure 35: Proposed High School Utility/Service Enclosure. Source: ISD (Attachment 97, Sheet C1.0LU – Civil Plans).

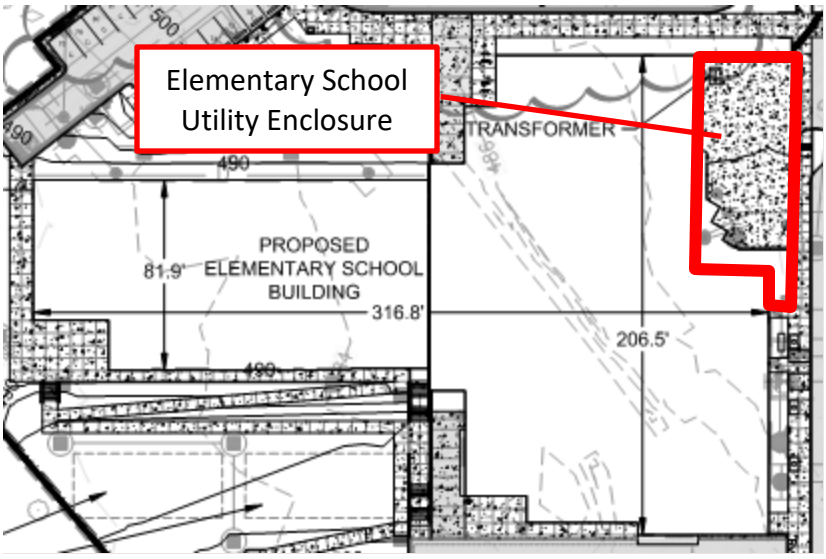


Figure 36: Proposed Elementary School Utility/Service Enclosure. Source: ISD (Attachment 97, Sheet C1.0LU – Civil Plans).

Both utility enclosures are located away from the most active pedestrian areas and are screened by architectural fencing (elementary school) and walls (high school). The openings will be gated with a matching architectural screen (elementary school) or service gate (high school). The high school service gate is oriented to face west and will not typically be seen by visitors to the site.

MECHANICAL EQUIPMENT CONCLUSION: Mechanical equipment meets applicable setback requirements.

f. Retaining Walls

There are 24 retaining walls located around the site, described in Table 9 in Section VII.A.14.f of this Staff Report. The Applicant is proposing to locate all retaining walls outside of applicable setback areas. There are no existing retaining walls on the property. Therefore, the criteria in IMC 18.07.110(B)(9)(a)-(b) and (d)-(e) do not apply to the proposal.

<u>Walls over Six Feet in Height</u>

Per IMC 18.07.110(B)(9)(c), retaining walls greater than six feet in height are required to have a three-foot guardrail or fence at the top. The Applicant is proposing to embed four-foot-high fencing (black vinyl coated chain link and/or decorative fencing, depending on the location of the wall) in retaining walls not associated with athletic facilities and other school features. The Applicant is proposing to include netting and/or windscreens at walls associated with athletic facilities. In all cases, walls over six feet high will have the required fence, and the proposed fence exceeds the minimum three-foot height requirement. See Attachment 99, Sheet L1.8LU – Landscape Plans. Compliance will be verified with the building permit for each retaining wall exceeding six feet in height.

Building Permit Requirements

Retaining walls greater than four feet in height require a building permit per IMC 18.07.110(B)(9). The Applicant will be required to obtain the required building permit prior to beginning construction activities in the vicinity of the retaining wall. The surface grade of any artificially filled area above a retaining wall is required to be level from the top of the retaining wall to a distance equaling one foot for every one foot in height of the retaining wall per IMC 18.07.110(B)(9). The surface grade will be reviewed, and compliance confirmed, with the building permit application for all fill walls. **[CONDITION 34]**

RETAINING WALLS CONCLUSION: As conditioned, the retaining walls meet applicable dimensional requirements, including specific requirements for walls greater than six feet high. The Applicant will obtain the required permits for the walls.

g. Pathways/Walkways

Walkways and other minor structural elements are allowed to protrude into a required setback under certain conditions pursuant to IMC 18.07.110(B)(10). The Applicant is not proposing any minor structural elements in setback areas. Walkways connect to 228th Avenue SE, but there is no required front setback in the CF-F zone (see Section VII.A of this Staff Report for additional information).

PATHWAYS/WALKWAYS CONCLUSION: The proposal complies with this requirement.

IMC 18.07.110 CONCLUSION: All accessory buildings and structures meet or, as conditioned, will meet applicable dimensional requirements.

2. IMC 18.07.107: OUTDOOR LIGHTING

SECTION SUMMARY:

The proposal includes site lighting and athletic field lighting. Site lighting will meet applicable illumination requirements, including spillover limits and uniformity ratios, and will include the use of full cutoff fixtures. Athletic field lighting will be provided at the stadium and at the tennis courts (not at the ball field complex) and will meet applicable illumination requirements. No security lighting has been proposed.

The proposal is required to comply with applicable outdoor lighting requirements in IMC 18.07.107.

a. Site Lighting

Table 18.07.107.E1 provides outdoor lighting standards for properties zoned CF-F:

Table 13: Summary of Applicable Outdoor Site Lighting Standards

Standard	CF-F Requirement
Maximum Exterior Lighting Level	5.0 footcandles (except per IMC 18.07.107(E)(4))
Minimum Public Area[66] Lighting	0.3 footcandles
Minimum Non-Public Area Lighting	See IMC 18.07.107(J), Security Lighting (discussed in Section VII.C.2.c of this Staff Report)
Light Spillover Limit (at property lines)	0.8 footcandles
Critical Area Light Spillover Limit	0.3 footcandles beginning at required buffer area
Maximum Public Area Uniformity Ratio	15:1
Full Cutoff Fixtures	Full cutoff fixtures are required for all lighting except for: a) cutoff or semicutoff fixtures of 1,250 lumens or less, b) unshielded fixtures of 900 lumens or less
Maximum Height of Lighting Poles	20 feet from grade 14 feet from grade for fixtures within 100 feet of residential districts For parking structures: 12 feet from driving surface for open top decks of parking structures

Staff Analysis: The Applicant provided photometric calculations for typical site lighting not associated with the athletic facilities (Attachment 101 – Electrical Site Plan). The maximum exterior lighting level will be approximately 4.9 footcandles. Per IMC 18.07.107(E)(4)(a), lighting can be as bright as 10 footcandles in activity areas that are active during dark hours and the activities need enhanced lighting. The Applicant has not identified any such activity areas, but will be required to adhere to applicable maximum lighting levels if such activity areas are identified in the future.

The Applicant's photometric calculations indicate that some plaza areas and nonmotorized pathways may be lit at less than 0.3 footcandles (Attachment 101 – Electrical Site Plan). The Applicant will be required to provide lighting illumination at a minimum of 0.3 footcandles in public areas, including in all plazas and along nonmotorized walkways. **[CONDITION 35]**

The Applicant estimates that spillover will occur at three areas around the property:

[66] Per IMC 18.02.180, Public areas means: "Those portions of a development intended for routine use and/or passage by the general public or customers or visitors to the development…."

- West of the softball outfield, estimated not to exceed 0.2 footcandles in compliance with Table 18.07.107.E1 limitations for adjacent properties.
- At the property line near Wetland B, estimated not to exceed 0.4 footcandles at the property line in compliance with Table 18.07.107.E1 limitations for adjacent properties
- At Wetland B, estimated not to exceed 0.1 footcandles in compliance with Table 18.07.107.E1 limitations for critical areas.
- At the secondary (emergency) access at the southernmost end of the property and along 228th Avenue SE, estimated not to exceed 0.1 footcandles in compliance with Table 18.07.107.E1 limitations for adjacent properties.

Based on the photometrics (Attachment 101 – Electrical Site Plan), the Applicant will comply with the maximum allowable lighting uniformity ratio of 15:1.

The Applicant has shown lighting fixtures on portions of the building elevations (Attachment 96 – Architectural Plans & Building Elevations) but did not provide adequate detail to determine compliance with requirements for full cutoff fixtures or lighting pole height in Table 18.07.107.E1. The Applicant will be required to demonstrate compliance with these requirements as part of construction permit reviews (Site Work and building permits). **[CONDITION 36]**

SITE LIGHTING CONCLUSION: As conditioned, the proposal will comply with applicable site lighting requirements.

b. Sports Field Lighting for Stadium, Ball Fields, and Tennis Courts

The Applicant is proposing sports field lighting at the stadium and the tennis courts. Lighting for outdoor sports facilities and playfields is regulated by IMC 18.07.107(I), which allows higher lighting levels needed to engage in outdoor activities. Lighting levels can be increased to no more than five percent greater than the illuminance level recommended by the Illuminating Engineering Society of North America (IESNA). IESNA recommends the following illuminance levels for high school sports facilities with 2,000 or fewer spectators, shown in Table 14 on the following page for informational purposes. Detailed review of lighting levels will occur with construction permits.

Table 14: IESNA Recommended Lighting Levels for Class III Sports Facilities. Source: IESNA RP-6-15.

Facility	Lighting Level (Footcandles)
Football Field	30
Baseball/Softball Field[67]	50 Infield
	30 Outfield
Tennis	50

Sports lighting fixtures are required to be mounted, aimed, and shielded to illuminate only the primary playing area and immediate surroundings; direct illumination of the site is prohibited. Event lighting requirements specify that main lighting be turned off as soon as possible following the event and a low-light system be used to facilitate patrons leaving the event.

ATHLETIC FIELD LIGHTING CONCLUSION: The Applicant has not provided enough information to determine compliance with these sports facilities and playfields and will be required to demonstrate compliance as part of construction permit reviews for each facility. Conditions will be applied to construction permits as needed to ensure compliance with design and construction and during operation of the facilities **(Condition 36)**.

c. Security Lighting

The Applicant has not identified any security lighting. If security lighting is proposed by the Applicant, it will be reviewed at the time of the request and must comply with requirements for security lighting set forth in IMC 18.07.107(J).

SECURITY LIGHTING CONCLUSION: There is no proposed security lighting.

IMC 18.07.107 CONCLUSION: As conditioned, the proposal meets or will meet applicable outdoor lighting levels for both site lighting and athletic/sports field lighting. No security lighting is proposed.

3. IMC 18.07.136: NOISE CONTROL

The City regulates noise under IMC 18.07.136 by adopting WAC 173-60-020 through WAC 173-60-050. In general, unamplified human voices are exempt from maximum permissible noise levels pursuant to WAC 173-60-050(4)(k) and motor vehicles[68] are exempt from maximum permissible noise levels pursuant to WAC 173-60-050(4)(a). The project will, however, include the following noise sources that were evaluated in a Noise Study prepared by The Greenbusch Group Inc., dated September 2, 2020 (Attachment

[67] Sports field lighting is not currently proposed at the ball field complex. This information is provided in the event of potential future project revisions.

[68] When regulated by Chapter 173-62 WAC, i.e. most passenger vehicles and school buses.

46 – Noise Study): stationary mechanical equipment, on-site traffic, school bus parking lot, two loading docks, and scene shop. The noise study includes recommended mitigations necessary to ensure the project will not exceed the maximum permissible noise levels set forth in WAC 173-60-040, shown in Table 15 below:

Table 15: Maximum Permissible Noise Levels and Predicted Noise Levels. Source: WAC 173-160-040 and ISD Application Materials (Attachment 46 – Noise Study).

	Maximum Permissible Noise Levels for Residential Receiving Properties		**Predicted Noise Levels at Residential Receiving Properties**	
	Daytime	**Nighttime**	**Daytime**	**Nighttime**
Community Services – Educational Source Property	57 dBA	47 dBA	53 dBA (HS) 52 dBA (ES)	46 dBA

Maximum permissible sound levels are provided for informational purposes. Detailed review of noise levels will occur with construction permits.

Recommended mitigation includes prohibiting pre-trip bus inspections[69] between 10:00PM and 7:00AM. The Applicant will be required to comply with this recommendation. **[CONDITION 37]** The Applicant will be required to conduct quarterly noise monitoring for the first year of operations and submit reports to the City to demonstrate compliance with the maximum noise levels. **[CONDITION 38]**

The baseball field, softball field, and stadium will be equipped with public address systems. The Applicant will be required to monitor public address systems at the property line to verify they do not exceed the maximum allowable noise limits described above. **[CONDITION 39]**

IMC 18.07.136 CONCLUSION: The proposal, as conditioned, will meet applicable noise requirements.

4. ***IMC Ch. 18.15: TRANSPORTATION CONCURRENCY MANAGEMENT***

A transportation concurrency certificate is required pursuant to IMC 18.15.230. The Certificate of Transportation Concurrency was issued on September 1, 2021 (Attachment 37 – Transportation Concurrency Certificate). The analysis concluded the proposal would generate 476 new PM peak hour trips.

IMC Ch. 18.15 CONCLUSION: The proposal passes concurrency requirements.

[69] Pre-trip bus inspections are safety inspections of buses prior to departing on pick up routes to ensure the vehicle is operating correctly.

SECTION VII.C OTHER TITLE 18 REQUIREMENTS CONCLUSON: Based on the foregoing analysis, and as conditioned, the proposal is consistent with applicable requirements for accessory buildings and structures, outdoor lighting, noise generation, and transportation concurrency.

D. Design Criteria Checklist

The project is required to comply with the entire Design Criteria Checklist included as Appendix 2 to Chapter 18.07 IMC. Design requirements are referenced in the Community Facilities Standards (IMC 18.07.480), the Master Site Plan Approval Criteria (IMC 18.07.660), and the Site Development Permit decision criteria (IMC 18.04.430). All sections of the Design Criteria Checklist must be addressed in the project design. This section of the Staff Report will refer to the enumeration provided in the Design Criteria Checklist for discussion of compliance. Refer to Attachments 4 and 5 – Design Criteria Narrative and Design Criteria Checklist Narrative – for additional information provided by the Applicant.

EXPLANATORY NOTE:
This section uses a different numbering system to coincide with the Design Criteria Checklist as adopted in IMC 18.07 Appendix 2:

> ***D. Design Criteria Checklist***
> ***A. CHECKLIST CATEGORY (per IMC 18.07 Apx. 2)***
> *1. Checklist Requirements*
> Subtopic Header

A. SITE LAYOUT AND OVERALL DESIGN CONCEPTS

1. *Building Location: Building locations and their orientation to one another provide for pedestrian/people areas such as courtyards, plazas, pocket parks, etc.*
   Staff Analysis: Each building includes a large plaza area at its main entries.

   High School. The high school includes a large plaza on the north and west sides of the building that connects to the stadium and other athletic facilities. The design also includes a south plaza with landscaping features. Both plazas will be furnished with tables and chairs to facilitate gathering, and both plazas are connected to each other and the larger site by nonmotorized pathways.

   Elementary School. The elementary school is designed with a plaza at the northwest corner with seating walls overlooking a slope to the classroom wing. The design also includes a plaza at the southwest corner of the classroom wing at the base of the playground. The northwest plaza is connected via nonmotorized pathways with the other building and athletic facilities throughout the site. The southwest plaza is connected with nonmotorized pathways to the rest of the playground but is gated from the rest of the campus for security.

   Ball Fields. The ball fields, located north of the entry boulevard, are joined by a plaza. The plaza can be accessed from nonmotorized pathways that connect to the rest of the campus.

A.1 CONCLUSION: The proposal complies with this criterion.

2. *Energy Efficient Design: The project is oriented to receive maximum winter sun benefit and uses architectural features and/or landscaping to screen summer sun.*
   Staff Analysis: The Applicant indicated that the buildings and fields have been oriented to take the best advantage of natural daytime lighting possible. Both the elementary school and the high school buildings are oriented east-west such that the primary facades generally face northward and the secondary facades face southward. This orientation optimizes daylight and reduce glare. According to the Applicant, this is the optimal solar orientation for school buildings.

   A.2 CONCLUSION: The proposal complies with this criterion.

3. *Functional Site Design: Design and layout of the buildings, parking areas, pedestrian areas, landscape and open areas are conducive to the existing topography and existing features of the site. Parking areas are designed so that they function well with the overall site design; for instance, parking areas provide safe and efficient nonmotorized movement, and traffic flow is predictable within the designated parking areas and driveways.*
   Staff Analysis: The Applicant indicated that site design is constrained by access, topography, and code requirements that limit design solutions meeting school district programmatic needs. The school buildings and athletic facilities have been located around the site to best fit the topography and limit grading, minimize retaining wall heights, and maximize tree retention. The site protects existing, mature vegetation around the perimeter of the property to retain a natural buffer for the adjacent residential neighbors, consistent with community comments on the proposal. Schools require buildings and facilities with large footprints and some grading is needed to accommodate these. To the extent practical, the Applicant has proposed locating the facilities to be conducive to existing topography and natural features.

   Parking areas have been located such that they are central with convenient nonmotorized connections to the school buildings and other site elements. Parking areas provide safe and efficient movement of both motorized and nonmotorized traffic. The parking areas prioritize safety through a combination of logical design features and signage/pavement markings consistent with the Manual on Uniform Traffic Control Devices (MUTCD).

   The site was organized around having a high school and an elementary school, each with sufficient queueing distance to minimize impacts to surrounding traffic. The majority of traffic flow to and from the site will be high school passenger vehicles for students and staff, followed by staff and parent passenger vehicles for the elementary school, followed by bus traffic. Site circulation has been laid out such that the major traffic flow contributors are removed from the main road in the order of their significance: the first vehicles to leave the entry boulevard are the high school passenger vehicles, then the

elementary school passenger vehicles, then the buses for the elementary school, then the buses for the high school. Directional signage supports navigation of the site to create a predictable traffic flow.

A.3 CONCLUSION: The proposal complies with this criterion.

4. *Lighting:*
   a. *Lighting standards and fixtures are of a design and size compatible with the general character of the building and adjacent areas, including other lighting standards/fixtures.*
   Staff Analysis: Fixture design, color, placement, and scale were considered to provide and compliment the overall site design and facilities. Exterior lighting at the school buildings is located at building entrances and canopies and along facades to emphasize architectural style while providing security around each building. Site lighting fixtures are typical for other school facilities in the region and provide security throughout the site. Sports field lighting is included in the site design to allow for evening events.

   A.4.a CONCLUSION: The proposal complies with this criterion.

   b. *Lighting complies with IMC 18.07.107, Outdoor lighting.*
   Staff Analysis: The Applicant provided photometric plans showing that the project complies with outdoor lighting requirements in IMC 18.07.107 (Attachment 101 – Electrical Site Plans). See Section VII.C.2 of this Staff Report for additional information.

   A.4.b CONCLUSION: The proposal complies with this criterion.

5. *Natural Setting – Views: The relationship of the natural setting of the valley and surrounding mountains is used to enhance the overall design and layout of the plan in the following ways:*
   a. *Hillside Design: Structures built on hillsides are designed so that they blend into the hillside to minimize their visible impact to surrounding areas. The ridgeline of the hillside is not broken by any structures, lighting standards/fixtures, or loss of vegetative cover. Methods to integrate the structure into the hillside include: height control; colors that are muted instead of brilliant or bright colors; maintenance of existing trees to the greatest extent possible; and/or other appropriate methods.*
   Staff Analysis: The site is located at the top of a hill and includes a central ridge with slopes of varying inclinations across the site. The buildings and site elements have been located on the property to respond to existing topography by "stepping" the building design and taking advantage of existing flat areas as much as possible to limit the amount of grading, minimize the heights of retaining walls around the site, and maximize tree retention. Buildings are shorter than the maximum allowable building height, balancing community concerns between height and footprint.

Buildings and site elements have been clustered toward the center of the site to preserve a buffer of existing, mature vegetation around the perimeter of the site to the maximum extent feasible.

Selected materials are muted or earth-toned and make use of texture to fit into the natural context (Attachment 91 – Exterior Colors and Materials Sample Board). The Applicant is generally proposing darker gray, taupe, beige, and brown colors, with a brick red accent and a white accent. Other materials include clay brick and frosted green and clear green glass. With the exception of the clear glass, all materials are matte-finished.

A.5.a CONCLUSION: The proposal complies with this criterion.

b. *Primary Views: Public views of Mount Rainier, Cougar, Squak and Tiger Mountains are not blocked; for example, the view of Mount Rainier from Rainier Blvd. and the railroad ROW pathway should remain unobstructed.*
Staff Analysis: There are no existing public views of Mount Rainier or Cougar, Squak, and/or Tiger Mountains. See Section VII.A.1 of this Staff Report for additional information. The proposed high school building will be the highest on the site but its elevation will be lower than the tops of existing trees and the existing water tower (to be demolished). Existing views will be maintained. The Applicant also submitted a view diagram demonstrating how viewpoints would be incorporated into the site design (Attachment 95 – View Vista Diagram).

A.5.b CONCLUSION: The proposal complies with this criterion.

6. *Existing Vegetation/Topography Features: Existing vegetation, topography and other features of the site are preserved and integrated into the overall site design. Suitable existing vegetation shall be preserved, and measures to assure its preservation shall be provided.*
Staff Analysis: The site has been designed to maximize tree retention and minimize site grading. According to the applicant, over nine acres of the existing 40.8 acre site (22 percent) will remain in its existing condition, resulting in approximately 78 percent of the site being developed. These areas of existing, mature vegetation will be maintained to remove any invasive species or noxious weeds and will be enhanced where demolition of existing site features occurs (i.e., where pavement from the Providence Heights Loop roadway is removed). A condition of approval requires permanent protection of the buffer area through a Native Growth Protection Easement or similar recorded instrument **(Condition 7)**. ISD will allow native plant salvage by local conservation groups prior to beginning construction. Trees and boulders removed during site construction will be salvaged for reuse on site as decorative natural elements. Trees removed during clearing will be milled into lumber for site amenities and building finishes.

A.6 CONCLUSION: As conditioned, the proposal complies with this criterion.

7. *Historical/Cultural Landmarks: Historical and cultural landmarks, and Issaquah Treasures (as adopted by Resolution 93-15) are preserved and integrated into the overall site design.*
   Staff Analysis: The site was originally developed as the Providence Heights College for the Sisters of Providence, a historically and architecturally significant collegiate institution. During condemnation proceedings, a landmark designation was granted by the Issaquah Landmarks Commission and vacated by the King County Superior Court. The college buildings were demolished and the Issaquah Landmarks Commission determined that the vacant land did not possess sufficient historic significance to meet designation criteria but provided recommendations for future development. The Department of Archaeology and Historic Preservation's WISSARD predictive model maps the area as having a low risk of encountering archaeological resources. The Landmarks Commission recommended including interpretive signage in the site or building design and will be required to provide it. See Section IV.A of this Staff Report for additional information. No other historical or cultural landmarks or Issaquah Treasures are known to be on the site.

   A.7 CONCLUSION: As conditioned, the proposal complies with this criterion.

DESIGN CRITERIA CHECLIST SECTION A CONCLUSION: As conditioned, the proposal meets applicable site layout and design concept requirements.

B. LANDSCAPE DESIGN AND USE OF PLANT MATERIALS

1. *Design Elements: Architectural screens, fountains, and pavings of wood, brick, stone, gravel and/or other similar methods and materials are used in conjunction or combination with plant materials (or in place of plant materials where planting opportunities are limited).*
   Staff Analysis: In addition to the landscape requirements and the planting palette in the proposal, the Applicant will reuse boulders and stumps from the site in pedestrian areas and plazas to incorporate the natural surrounding into the project design. Trees to be removed will be harvested and milled into lumber used in the finish materials for both schools, further incorporating the buildings into the natural setting. Greenscreens underplanted with climbing vines will be installed where space is limited.

   B.1 CONCLUSION: The proposal complies with this criterion.

2. *Design Unity: Unity of design is achieved through repetition of certain plant varieties and other materials and by correlation with adjacent developments.*
   Staff Analysis: Existing, mature vegetation around the perimeter of the site will be retained and enhanced. Similar plant varieties will be used throughout the site to

correlate to the natural buffers and surrounding areas. Repetition of plant varieties provides design unity and interrelatedness through all major areas of the site.

B.2 CONCLUSION: The proposal complies with this criterion.

3. *Enhanced Design:*
   a. *The landscape design of the site strengthens vistas and important focal points, provides for both solar exposure and shading where desirable, and retains significant existing vegetation.*
   Staff Analysis: The existing, mature vegetation around the perimeter of the site will be protected and enhanced as part of this project. While there are no views of any mountains (treed hillsides), lakes, streams, or other significant natural features, the Applicant has included an overlook to Wetland B and other viewpoints into the site design (Attachment 95 – View Vista Diagram). The site also includes open plazas, seating areas, and similar gathering spaces in a variety of locations that take advantage of solar exposure and shading.

   B.3.a CONCLUSION: The proposal complies with this criterion.

   b. *Trees and shrubs are planted in parkways or paved areas where building sites limit plantings.*
   Staff Analysis: The proposal includes street trees, a landscaped center median in the entry boulevard, parking lot landscaping, and other landscaping areas planted with a mix of trees, shrubs, and groundcover. Pedestrian plazas include edge landscaping and, in select areas, interior landscaping and walking paths.

   B.3.b CONCLUSION: The proposal complies with this criterion.

   c. *Parking areas and traffic ways are enhanced with landscaped areas that contain trees and tree groupings.*
   Staff Analysis: Trees and tree groupings are incorporated throughout the site, including in parking areas and along motorized and nonmotorized circulation facilities.

   B.3.c CONCLUSION: The proposal complies with this criterion.

4. *Usable Open Space Design: The usable open space includes significant areas which have aesthetic value and/or value for recreational purposes and is easily accessible to the users of the development and to the general public (in cases where the open space has been dedicated), unless this guideline conflicts with the purpose and intent of the critical areas regulations.*
   Staff Analysis: The site includes a significant amount of community space that will be available for public use after school hours in accordance with an agreement with the Issaquah Parks and Community Services Department. These areas include athletic

facilities, nonmotorized pathways, plazas, playground, and others that provide recreational value for students and staff as well as the broader community. The vegetated buffer has an aesthetic benefit for the adjacent neighbors and the surrounding community, and is a priority for the City of Sammamish as a character-contributing element of its southern gateway. Recreational amenities are easily accessible from parking areas and from the 228th Avenue SE right-of-way. Directional signage supports users in navigating the site.

B.4 CONCLUSION: The proposal complies with this criterion.

5. *Plant Materials – Selection:*
   a. *Appearance/Maintenance: Plant materials are selected for their structure, texture, and color as well as their ultimate growth and ease of maintenance.*
   Staff Analysis: The plant palette for the site includes a mix of coniferous and deciduous trees, shrubs, groundcovers, and climbing vines that provide a variety of structures, textures, and color. Plants grow to varying heights and widths, have varying spring, summer, and fall colors, and together provide a rich texture in landscaping areas. See Attachment 99, Sheet L2.0.ALU – Landscape Plans for additional information.

   B.4.a CONCLUSION: The proposal complies with this criterion.

   b. *Noxious or Destructive: Plant materials used for landscaping purposes are not destructive to sewer or water systems, sidewalks, building foundations or any other structure or utility. Noxious weeds and other plant materials including purple loosestrife and invasive species of ivy are not utilized in landscape planting plans.*
   Staff Analysis: The plant materials are not destructive and do not include any noxious weeds or invasive species. See Attachment 99, Sheet L2.0.ALU – Landscape Plans for additional information.

   B.5.b CONCLUSION: The proposal complies with this criterion.

   c. *Safety: Alder trees, cottonwood trees or other trees that typically grow very quickly, have weak trunks and branches and are prone to falling are not proposed for planting in parking areas, next to buildings or other structures or in any pedestrian-oriented area. Tree selection and placement should not diminish required outdoor lighting illumination of the intended pedestrian areas and*

parking lots. Tree selection and placement may be used to screen lighting from adjacent properties or downgrade viewing.
Staff Analysis: Alders, cottonwoods, and similar trees are not included in the plant palette. See Attachment 99, Sheet L2.0.ALU – Landscape Plans for additional information.

B.5.c CONCLUSION: The proposal complies with this criterion.

SECTION B LANDSCAPE DESIGN AND USE OF PLANT MATERIALS CONCLUSION: The proposal complies with applicable landscaping and plant material requirements.

C. DESIGN HARMONY AND COMPATIBILITY

1. *Accessory Structures: Street furniture, mailboxes, kiosks, lighting standards/fixtures, and accessory structures located on private property, public ways and other public properties are designed as part of the architectural concept of the building and landscape design.*
   Staff Analysis: The Applicant has provided unifying elements across the site including a palette of building and planting materials. These design elements are incorporated in and around buildings and accessory structures throughout the site, creating elements of continuity that tie the structures to one another across the site and into a cohesive design. The restroom buildings will be required to be aesthetically screened. **[CONDITION 40]**

   C.1 CONCLUSION: As conditioned, the proposal complies with this criterion.

2. *Building Materials/Components:*
   a. *Scale: Building components, such as windows, doors, eaves, parapets, and signage have the same proportions, scale and relationship to one another. Building materials shall incorporate fire protection and emergency services access.*
      Staff Analysis: The elementary school and high school relate to one another using similar building materials, color palette, proportion, and details. Both offer covered entry vestibules that are one story tall. Windows into classrooms at grade wrap around the building and offer a pedestrian scale. The large glass curtain all provides expansive connections from exterior plazas through the Commons. Each elevation is carefully composed using building components to provide a consistent and thoughtful design.

      Fire protection and emergency services access are provided around the building meeting all code requirements. Eastside Fire and Rescue reviewed the application materials and found them in general conformance with

requirements. Compliance will be verified prior to issuing construction permits for the project.

C.2.a CONCLUSION: The proposal complies with this criterion.

b. *Durability/Maintenance: Materials and finishes are selected for their durability and wear. Proper measures and devices are incorporated for protection against the elements, neglect, damage, and abuse. Configurations that tend to catch and accumulate debris, leaves, trash, and dirt should not be used.*
Staff Analysis: According to the Applicant, durability is a major factor in school design. To help reduce maintenance costs and resist damage, the building facades include masonry veneer and ultra high performance concrete panels at ground level. Other durable building materials in the proposal include mineral fiber reinforced cementitious panels and metal wall panels. See Attachment 91 – Exterior Colors and Materials Sample Board.

C.2.b CONCLUSION: The proposal complies with this criterion.

3. *Compatibility: The proposed development is designed and oriented to be compatible with existing permitted land uses adjacent to the site and with the surroundings, both manmade and natural. Elements influencing compatibility include but are not limited to color, signage and lighting, size, scale, mass, and architectural style and design.*
Staff Analysis: The Applicant indicated that the proposal is designed to complement the surrounding residential community. Both schools are limited to three stories in height by zoning code requirements, which is similar to the adjacent three- and four-story condominium buildings and community complexes.

The heavily wooded site influenced the selection of building materials and color palette. Natural earth toned colors, as well as material articulation, help blend the buildings into the natural surroundings. The buildings are oriented near the center of the site to accommodate preservation of a wide vegetated buffer between the schools and the adjacent residential neighbors. Site lighting meets or will meet applicable code and safety requirements while limiting spillover onto neighboring properties. According to the Applicant, plazas, landscape, and pedestrian amenities all contribute to making this development a welcoming facility to the community.

C.3 CONCLUSION: The proposal complies with this criterion.

4. *Design Components:*
   a. *Colors: Bright and/or brilliant colors are used only minimally for accent.*
   Staff Analysis: The proposal uses natural earth-toned colors to blend the buildings into the site and complement the wooded surroundings. Accent colors are used selectively to reinforce building massing and to articulate and break up

the building facades. See Attachment 91 – Exterior Colors and Materials Sample Board and Attachment 98 – Architectural Plans & Building Elevations.

C.4.a CONCLUSION: The proposal complies with this criterion.

b. *Modulation: Modulation has been incorporated in the overall design to reduce the bulk and mass of the building(s).*
Staff Analysis: "Modulation" means projections and step-backs of different sections of the façade of a structure, sometimes with specified intervals of width and depth. The IMC does not specify any width or depth requirements for modulation for school buildings. The Applicant has designed the facades with projections and step-backs of different masses that express programmatic elements and has included materials of varying scales to break up the buildings' facades and massing. According to the Applicant, programmatic elements such as the glassy Commons in the high school and the cantilevered library and classroom wings demonstrate these important design features.

C.4.b CONCLUSION: The proposal complies with this criterion.

c. *Facade: Articulate the different parts of a building's facade by use of color, arrangement of facade elements, or a change in materials.*
Staff Analysis: Each façade is composed of a unique arrangement of color, texture, fenestration, and changes in depth of materials to express the building's design, reduce the scale and bulk, respond to unique site elements, and emphasize massing. Facades include articulation.

C.4.c CONCLUSION: The proposal complies with this criterion.

d. *Ground Level: Avoid blank walls at the ground level. Utilize windows, trellises, wall articulation, arcades, changes in materials, or other features.*
Staff Analysis: Modulation of wall materials, use of windows, use of greenscreens and vegetative support systems break up large expanses of blank walls.

C.4.d CONCLUSION: The proposal complies with this criterion.

e. *Large Structures: Large dominating structures should be broken up by creating horizontal emphasis through use of trim, adding windows or other ornamentation, use of colors, and landscape materials.*
Staff Analysis: Massing, modulation and articulation to express programmatic elements, and human-scale detailing break up the buildings to create a welcoming experience for students, staff, and visitors. Building materials, windows, and mullion spacing help reduce the scale of the buildings.

C.4.e CONCLUSION: The proposal complies with this criterion.

f. *Corporate Style: The use of standard "corporate" architectural style associated with chain-type business is strongly discouraged.*
Staff Analysis: No standardized or corporate style architecture is proposed.

C.4.f CONCLUSION: The proposal complies with this criterion.

5. *Signage:*
   a. *Architectural Element: Every sign is designed as an integral architectural element of the building and site to which it principally relates; lighting of signage is compatible with the architectural character of building; and is compatible with signs on adjoining premises.*
   b. *Graphic Elements: Graphic elements are held to the minimum needed to convey the sign's major message and are composed in proportion to the area of the sign face.*
   c. *Materials: The colors, materials, and lighting are held to the minimum needed to convey the sign's major message and are composed in proportion to the area of the sign face.*
   d. *Scale/Proportion: Every sign is of compatible scale and proportion in design and visual relationship to buildings and surroundings.*
   Staff Analysis: The Applicant has limited site signage to the minimum necessary to direct visitors around the campus. Monument signs at the entry drive and each school building are designed as integral architectural elements of the site through the use of similar form and materials. Directional signage provides simple assistance in navigating the site. All signage minimizes graphic elements and visually distracting colors and materials. The signage complies with applicable requirements in Chapter 18.11 IMC.

   C.5.a-d CONCLUSION: The proposal complies with these criteria.

6. *Transition:*
   a. *The proposed development transitions well with adjoining, permitted land uses through architecture and landscaping in conformance with allowable setbacks.*
   b. *Conflicting Architectural Styles: In applicable cases, structures are made compatible with adjacent buildings of conflicting architectural styles by such means as screens and site breaks, or other suitable methods and materials.*
   Staff Analysis: In addition to minimum code requirements, the proposal includes the protection of a significant amount of existing, mature vegetation around the perimeter of the property. This provides a buffer between the schools and adjacent residential neighbors and exceeds required setbacks. Compatibility is enhanced by orienting the most active spaces and facilities toward the center of the site as much as possible.

   C.6.a-b CONCLUSION: The proposal complies with this criterion.

7. *Projects with Multiple Structures: Variable siting of individual buildings, heights of buildings, building modulation or other methods are used in order to prevent monotonous design.*
   Staff Analysis: The proposal locates buildings and major athletic facilities around the site, at varying elevations and with varying building heights, and with unique modulation on each facade. Siting takes advantage of the natural topography to integrate each building into its immediate surroundings. Buildings are designed to visually express programmatic functions and public spaces through articulation and massing and the use of different façade materials. The site is clearly architecturally related through building design, accessory structures, colors and materials, landscaping, and similar design features, but the location and massing are unique to each building and avoid monotonous design.

   C.7 CONCLUSION: The proposal complies with this criterion.

SECTION C DESIGN HARMONY AND COMPATIBILITY CONCLUSION: As conditioned, the proposal will meet all requirements for building and structure design and materials. The project transitions between land uses and avoids conflicting or corporate architectural styles.

D. NONMOTORIZED AND VEHICULAR AREAS

1. *Barrier-Free: The location of the ADA-accessible pedestrian access ramp is in close proximity to designated parking space(s).*
   Staff Analysis: The building code regulates the location of ADA-accessible parking with respect to building entries. Compliance is reviewed with the building permit.

   High School and Stadium. Accessible and van-accessible parking spaces are provided on the south side of the parking structure to the north of the north main entry to the high school that meet the requirements in the building code and Accessible and Usable Buildings and Facilities (ICC A117.1). The Applicant is required to provide equal covered parking areas and will provide a canopy over the accessible spaces on the south side of the parking structure. **[CONDITION 41]** Students and visitors parking in those spaces will exit the parking structure at approximately the same grade as the school entry, crossing the parent drop-off roadway to head directly south to the school or south and west to the stadium.

   Elementary School. Accessible and van-accessible parking spaces are provided in the surface parking lot located just northeast of the elementary school building. Visitors parking in those spaces will exit the parking lot at approximately the same grade as the school entry and use the nonmotorized walkway to travel south, west, and south again to access the school's main entry.

Ball Fields. One additional accessible parking space is provided at the ball fields and plaza complex on the north side of the main entry boulevard. This parking space provides direct access to the plaza via an accessible route of travel.

D.1 CONCLUSION: The proposal complies with this criterion.

2. *Circulation/Trail Access: Linkages for safe circulation for pedestrians and bicycles are provided within the site, and connect adjoining existing or proposed sidewalks and bicycle paths. Developments, including single family subdivisions, maintain trail access to existing and established trails through dedication of public easements.*
   Staff Analysis: Nonmotorized access to the site does not currently exist but will be provided with frontage improvements in the 228th Avenue SE right-of-way. The entry drive will include nonmotorized pathways on each side connecting to the new sidewalks and bike lane infrastructure in 228th Avenue SE. The nonmotorized circulation network continues into and throughout the site, linking all buildings and accessory facilities. No existing or established trails exist in the vicinity.

   D.2 CONCLUSION: The proposal complies with this criterion.

3. *Design – Parking Areas: Vehicle parking areas are designed into the project in a manner that screens the majority of the parking area from both the public and the building occupants. Methods for limiting the visibility of the parking area to the surrounding area include: orienting parking areas away from building and pedestrian areas; placing the building adjacent to the main roadway, with parking behind the building; screening parking areas with intensive landscape barriers which provide solid screening during all seasons; using wooden fencing, berms or other solid method of screening; and/or other creative means.*
   Staff Analysis: Schools are a unique use that benefit from having parking readily accessible from and viewable by the adjacent buildings. The parking areas will be landscaped with a mix of trees, shrubs, and groundcover distributed in the interior and the edges of the parking areas in compliance with CIDDS Chapter 10.0 *Landscape*. The entire site is well-screened around the perimeter by existing, mature vegetation that will be protected and enhanced and will provide screening from surrounding properties during all seasons.

   D.3 CONCLUSION: To the extent feasible and safe, the proposal complies with this criterion.

4. *Public Access – Adjacent to Site: In areas where lakes, parks and scenic or shared use corridors and other recreational areas are adjacent to the project boundaries, public*

access is encouraged and enhanced in an environmentally sensitive manner beyond the predevelopment status.
Staff Analysis: No public features, shared use corridors, or other recreational areas are adjacent to the project boundaries.

D.4 CONCLUSION: This criterion does not apply.

5. *Public Access – Within Site: In nonresidential projects, provisions are made for public access to any lakes and to scenic corridor areas within a site. The access is environmentally sensitive in design.*
Staff Analysis: No lakes or scenic corridor areas are present within the site.

D.5 CONCLUSION: This criterion does not apply.

6. *Trail and Nonmotorized Facility Design: Pedestrian and bicycle paths are designed to limit conflicts between motorized and nonmotorized modes, by providing a separated walkway system, bicycle facilities, permanent markings, and other methods. Trails or other nonmotorized facilities should use features such as setbacks, landscaping, fencing, grade separation, and sight lines to maximize the privacy provided to any adjacent single family homes.*
Staff Analysis: The proposal includes nonmotorized pathways, including a shared-use pathway, that are separated from adjacent internal access roads by landscaping strips wherever possible. Road crossings are designed with a visually distinct material (concrete) from the roadway surface (asphalt) to create a defined crossing and improve crossing safety. The site is designed to contain nonmotorized traffic largely within a central area around each school through the location of different amenities, entries, and site features. Existing, mature vegetation will screen the nonmotorized facilities from adjacent residential development. Bicycle racks are located at the north entrances to both school buildings.

D.6 CONCLUSION: The proposal complies with this criterion.

7. *Transition of Design Elements and Amenities: The site plan provides a desirable transition in relation to the streetscape, including adequate planting, safe nonmotorized movement, and parking areas.*
Staff Analysis: According to the Applicant, separation of motorized and nonmotorized traffic was a critical design imperative for the project. The location of parking, roads, bus loops, vehicular drop-offs, nonmotorized pathways, and plazas have been oriented to minimize potential conflicts between pedestrians and vehicles. Drop-off locations for the elementary and high school buildings are on pathways directly connected to the main entry points for each building. Once students are on the nonmotorized pathways, they can directly access the buildings without crossing motorized traffic. The majority of parking for the site can access

site amenities with limited crossing of vehicular traffic. In most cases, people leaving their car need to cross no more than one road to enter pedestrian areas of the site.

D.7 CONCLUSION: The proposal complies with this criterion.

SECTION D NONMOTORIZED AND VEHICULAR AREAS CONCLUSION: The proposal includes appropriate provisions for barrier-free access, vehicular and nonmotorized access, and parking. The project effectively transitions between circulation facilities and site structures.

E. SERVICE AND STORAGE AREAS

1. *Screening – Service Yards and Outdoor Storage: Service yards, machinery storage, other storage areas, dumpster/recycling areas and other places which tend to be unsightly are screened through the use of walls and/or fencing of solid material, softened or accented by plantings. The height of the walls/fencing shall be six (6) feet in height, or at least the height of the items to be screened.*
   Staff Analysis: The proposal includes a waste enclosure and loading area at each school building. These service areas will be screened with materials selected to blend in with the larger mass of the building. The high school service area will be enclosed with a 10-foot block wall and accessed on the east side, as far as possible from any pedestrian or vehicular circulation areas. The elementary school service area will be screened by a 9.5-foot architectural metal screen and will be accessed on the east side, as far as possible from the main entry to the school. See Attachment 98 – Architectural Plans & Building Elevations.

   E.1 CONCLUSION: The proposal complies with this criterion.

2. *Screening – Mechanical Equipment: Mechanical equipment is completely screened. Screening will be effective in both winter and summer. Examples of mechanical equipment include electrical transformer pads and vaults, communication equipment, and other utility hardware on roofs, grounds or buildings.*
   Staff Analysis: The proposal includes roof-mounted mechanical equipment and ground-mounted equipment. Roof-mounted equipment will be screened by mechanical penthouses consisting of solid sight-obscuring walls that blend architecturally with the rest of the building by using the same materials and colors. Ground-mounted equipment will be located in the loading area for each school. Loading areas are screened by solid sight-obscuring walls that blend architecturally with the rest of the building through the use of similar or related materials and colors. See Attachment 98 – Architectural Plans & Building Elevations.

   E.2 CONCLUSION: The proposal complies with this criterion.

3. *Screening – Display Areas: Outdoor display areas for vehicles, other equipment for sale or rent, or live plant material are landscaped in a manner that breaks up the*

mass of pavement or displayed items but need not be landscaped to have the same screening effect required for a service or storage area.
Staff Analysis: The proposal does not contain any outdoor display areas.

E.3 CONCLUSION: This criterion is not applicable.

SECTION E SERVICE AND STORAGE AREAS CONCLUSION: The proposal complies with applicable criteria.

F. CRIME PREVENTION THROUGH ENVIRONMENTAL DESIGN (CPTED) IMPLEMENTATION MEASURES INVOLVING LANDSCAPING
This section contains criteria for subdivisions, single-family development, multifamily development, storefronts, and offices. The proposal does not contain any of these types of development and the CPTED criteria are not applicable.

IMC 18.07 APPENDIX 2 DESIGN CRITERIA CHECKLIST CONCLUSION: As conditioned, the proposal complies with applicable design criteria checklist requirements to ensure compatibility with adjacent developments and the public realm and a high quality design.

E. Clearing, Grading, and Stormwater Management

Clearing, grading, and stormwater management is regulated under Chapters 16.26 and 18.10 IMC. The design and analysis documents have been reviewed commensurate with land use permit review. Conceptual road, nonmotorized pathway, and utility plans were reviewed for compliance with the appropriate standards. A detailed review of the roads, pedestrian routes, and utilities will be completed during the Site Work permit(s) review and approval.

1. CLEARING AND GRADING

For development within the City of Issaquah, the Applicant is required to obtain site work permits to grade the site and construct roads, walkways, utilities, and similar features in the proposal. While project applicants are typically required to provide a security consistent with IMC 16.26.120, as a matter of policy the City of Issaquah does not collect securities from public agencies. Where a security is required, the District shall provide a letter of commitment identifying the scope of work to be completed and the time frame to do so. **[CONDITION 42]**

The applicant is required to provide all necessary third-party inspections for site walls and, upon completion, provide a summary letter of certification of compliance with the approved plans and specifications stamped by a licensed Washington State Professional Engineer.

CLEARING AND GRADING CONCLUSION: The proposal complies with applicable clearing and grading requirements.

2. *STORMWATER MANAGEMENT*

The project conveys stormwater runoff through the City of Sammamish and the City of Issaquah. The City of Issaquah has adopted the 2014 Washington State Department of Ecology Stormwater Management Manual for Western Washington and a City of Issaquah 2017 Addendum pursuant to IMC 16.26.050. The City of Sammamish has adopted the 2016 King County Surface Water Design Manual and a City of Sammamish Addendum. Staff determined that despite separate Stormwater manuals, the stormwater requirements for this project are equivalent under both jurisdictions. Project requirements for flow control, enhanced treatment, and Sensitive Lake Protection are the same for on and off-site improvements in both Issaquah and Sammamish.

The Preliminary Storm Technical Information Report (TIR) includes storm designs based on a higher amount of impervious surface area than the impervious area coverage shown on the Impervious Surface Diagram (Attachment 94). When designing the stormwater system, the applicant overestimated the impervious area to allow for additional capacity needed due to unforeseen changes that may occur during the land use process.

The TIR is subject to additional review for compliance with recommendations in 2014 Stormwater Manual for Western Washington, I-2.6.2 Optional Guidance #2: Off Site Analysis and Mitigation, adopted by the City of Issaquah. This review will be completed with the Site Work 1 permit.

a. Stormwater – Flow Control

Both jurisdictions require detention facilities and flow control structures to detain and release stormwater at rates equal to or less than 50 percent of the two-year to the 50-year peak flow. All stormwater runoff generated by the proposed project site and required frontage improvements will continue to use two primary drainage basins (Northeast and Southwest), and will retain the ultimate discharge locations of Laughing Jacobs Creek and Lake Sammamish.

The Northeast basin discharges east to 228th Avenue SE and north along the roadway into the City of Sammamish. Street and frontage improvements are required as part of this school project and are therefore not a separate project. Street and frontage improvements must be designed for compliance with City of Sammamish requirements, The stormwater design for street and frontage improvements must be part of the Final Stormwater TIR, or provided as an Addendum to the Final Stormwater TIR, and must be submitted to the City of Issaquah with construction permit applications for site work and to the City of Sammamish with construction permits for right-of-way improvements. **[CONDITION 43]**

The Southwest basin historically discharged stormwater through the existing collection system within the Providence Point community, which was conveyed to the City of Issaquah through a 2006 agreement (Recording No. 20060622001051). Preliminary stormwater design protects the existing storm system in Providence Point and ensures that, under future developed conditions, discharges up to the 100-year precipitation event will not be increased. To maintain the historical flows, the Applicant proposes to continue the use of these downstream points of connection. The historical discharges have been modeled based on the previous development (Providence Heights College) and are proposed to be maintained, except certain 100-year storm peak overflows. These peak overflows are proposed to be discharged to the storm water collection system in SE 43rd Way. The Applicant is required to protect the Providence Point stormwater system, and the system design will be verified during review of the City of Issaquah Site Work 1 permit. **[CONDITION 44]** Turbid runoff during construction must be addressed with the City of Issaquah Site Work 1 permit and is not allowed to discharge to the Providence Point private detention system during construction. **[CONDITION 45]**

b. Stormwater – Runoff Treatment

Both jurisdictions require the runoff from areas with vehicular use (pollution generating impervious surfaces, PGIS) to be treated on-site. Enhanced treatment (removal of dissolved metals) is required for PGIS under both jurisdictions (Issaquah and Sammamish). Use of enhanced treatment will be verified during review of the Site Work 1 permit.

Since both basins discharge into Laughing Jacobs Creek and Lake Sammamish, all PGIS area runoff generated on site and from the frontage improvements will be designed to include the removal of phosphorus to protect aquatic life. Phosphorus removal is required by both jurisdictions.

STORMWATER CONCLUSION: As conditioned, the proposal complies with applicable City of Issaquah stormwater requirements.

F. Vehicular Circulation Facilities and Traffic

1. INTERNAL CIRCULATION FACILITIES

Eastside Fire & Rescue (EF&R) allows a 15 percent maximum grade for fire department access roads that are not considered streets. The Applicant has designed internal access roads to be 12 percent or less. The Applicant is required to provide a letter from a licensed Washington State Professional Engineer to EF&R stating that the final grade of all fire access roads did not exceed 15 percent.

CONCLUSION: The proposal's roadways do not exceed 12 percent grade and comply with EF&R requirements for access.

2. *228TH AVENUE SE AND SE 43RD WAY RIGHT-OF-WAY IMPROVEMENTS*

Access to the proposed development will be from a primary single controlled intersection off 228th Avenue SE with a secondary emergency access along the southerly margin of the project site. The primary access, together with the 228th Avenue SE roadway and frontage improvements, are within the right-of-way under the jurisdiction of the City of Sammamish; the secondary access, together with the SE 43rd Way roadway and frontage improvements with are within the right-of-way under the jurisdiction of the City of Issaquah. The jurisdictional boundary is identified in Figure 37, below.

Figure 37: City of Issaquah/City of Sammamish Jurisdictional Boundary. Annotations provided by Staff. Source: City of Issaquah GIS.

While the primary access will have a leg of the intersection extending westerly beyond the edge of the 228th Avenue SE right-of-way into the Issaquah city limits, the Cities have agreed that the City of Sammamish will both manage and maintain the entire intersection, including this leg. The Applicant is required to comply with all City of Sammamish requirements and standards regarding the design and construction of the

primary intersection together with 228th Avenue SE right-of-way improvements. **[CONDITION 46]** The Applicant is required to facilitate the development of an interlocal agreement between the Cities of Issaquah and Sammamish to operate and maintain the intersection. **[CONDITION 47]**

The City of Issaquah Street Standards dated October 15, 2010 (Street Standards) require limiting a driveway access to a right turn in, right turn out configuration when a driveway intersects Principal and Minor Arterials, unless the driveway is signalized for full access and the location meets the minimum spacing requirements (Design Section, B. Access Control Driveways, #3). The proposed driveway location is approximately 1,100 feet from the recently constructed signalized intersection of Providence Point Drive SE and SE 43rd Way. The proposed secondary access alignment is located at the same point of intersection as the existing Providence Heights Loop internal access roadway and is intended for emergency access only. A Deviation of Standards request was reviewed and approved by Community Planning and Development and Public Works staff per Section O of the Street Standards (see Deviation, below). As conditioned, and with the approval of the deviation, the proposal meets applicable street design requirements set forth by the City of Issaquah. The Applicant is required to obtain right-of-way permits for the construction of roadway and frontage improvements in 228th Avenue SE from the City of Sammamish. As of the date of this Staff Report, construction permits had not yet been submitted to the City of Sammamish.

CONCLUSION: The proposal is providing adequate frontage and capacity improvements to meet applicable City of Issaquah requirements. Frontage and capacity improvements in the City of Sammamish are separately reviewed by that jurisdiction.

3. DEVIATION

The Public Works Department approved a deviation to reduce the minimum centerline spacing of intersecting streets and access points as required in the City of Issaquah Street Standards, *Design,* Section A *Intersections* as it relates to the intersection of Providence Point Drive SE and the existing Providence Heights Loop driveway at 228th Avenue SE/SE 43rd Way. The standard is 2,600 feet of spacing on Principal Arterials (228th Avenue SE/SE 43rd Way). The existing spacing between these two intersections is approximately 1,200 feet. The standard allows for spacing less than the minimum if the access is limited to right-in and right-out. The existing access will be converted to emergency vehicles only with full access during emergencies and a deviation is required. The request has been approved with the emergency access only mitigation.

G. Other City Departments and Reviews

1. SITE CONTAMINATION

Lead contamination was identified on the project site in soils beneath and surrounding the water tower in the southern portion of the property. The Applicant submitted a

Water Tower Lead in Soil Screening Summary prepared by PBS Engineering and Environmental on March 3, 2020 (Attachment 58) and a *Phase 1 Environmental Site Assessment* (ESA) prepared by Associated Earth Sciences, Inc. on October 12, 2021 (Attachment 59). Analysis of soil samples found lead concentrations in excess of the maximum criteria level at one location and in excess of criteria for "dangerous waste" at the same and two additional locations (see Attachment 59, page 2). The PBS report includes recommendations for removing contaminated soil that the Applicant is required to implement. **[CONDITION 48]**

The ESA further identified prior polychlorinated biphenyl (PCB) contamination that lacked documentation for successful removal and remediation (see Attachment 59, page v). The Applicant will pursue a "No Further Action" letter from the Department of Ecology to confirm removal and remediation was successfully completed at the time of building demolition in August 2018 **(SEPA condition 36)**. The ESA also identified potentially impacted soils in the vicinity of three underground storage tanks that were removed on October 3, 1996 (see Attachment 59, page vi). The Applicant is required to implement the recommended soil management plan when working in the vicinity of the (since-removed) underground storage tanks. **[CONDITION 49]**

No other Recognized Environmental Conditions (RECs) were identified. Two Historic RECs were addressed to the satisfaction of the Department of Ecology and no further action is required (Attachment 59, page 19).

VIII. Approval Criteria

A. Master Site Plan Approval Criteria

Master Site Plans are subject to the approval criteria set forth in IMC 18.07.660(F):

1. COMPREHENSIVE PLAN CONSISTENCY

Pursuant to IMC 18.07.660(F)(1), the project must be compatible with and permitted by the Issaquah Comprehensive Plan. The property is not within an area (subarea or neighborhood) plan boundary.

The Applicant submitted a Comprehensive Plan Narrative (Attachment 8 – Comprehensive Plan Narrative) describing the project's consistency with the City of Issaquah's adopted Comprehensive Plan. The Comprehensive Plan designates the subject property as Community Facilities (see Section IV.C of this Staff Report for additional information) and the proposal is permitted by the Comprehensive Plan as a community facility providing public education through the implementing regulations described in Section VII of this Staff Report.

The project will provide an essential public service necessary to support projected population growth across the city. The proposal is consistent with the following goals and policies, among others:

LU Goal A: Maintain and enhance the natural systems and features of the City and surrounding area from the potentially negative impact of human activities, including but not limited to, land development.

> LU Policy A3: Encourage efficient use of land by allowing clustering of buildings within developments, consistent with the City's development and design standards, to provide the maximum consolidated pervious surface, open space, efficient extension of urban services, and protection of critical areas and their buffers.
>
> LU Policy A8: Discourage any changes to increase the Urban Growth Boundary adjacent to Issaquah and increased density of property outside the Urban Growth Boundary.

Staff Analysis: The proposed project is within the Urban Growth Boundary consistent with the King County School Siting Task Force recommendations issued in 2012 (see Section IV.B of this Staff Report for more information). The project is designed to cluster buildings and facilities toward the center of the property, allowing preservation of a significant proportion of existing, mature vegetation around the site. The resulting design provides the maximum consolidated pervious surface and open space while providing necessary public services within a targeted area of the Issaquah School District's boundary projected to see increased enrollment. The site protects critical areas where possible and mitigates for impacts caused by the project.

LU Goal H: Allow for and accommodate growth in a manner that is fiscally responsible, responsive to the community and enhances and protects the natural environment.

> LU Policy H1: Encourage and develop municipal facilities such as libraries, parks, culture, recreation and education facilities, in a fashion that does not overextend the community's ability to pay for needed facilities or decrease service levels below locally established minimum standards.
>
> Policy LU H2: Maintain development regulations that promote compatibility between uses, retain desired neighborhood character, ensure adequate light, air and open space, protect and improve environmental quality and manage potential impacts on public facilities and services by addressing features such as pervious surface ratios, density, setbacks, height, location of garages and parking areas, design standards, landscaping, and pedestrian linkages.

Staff Analysis: The proposal makes efficient use of available land to site both an elementary school and a high school with accessory facilities necessary to support a comprehensive public education. The proposal does not overextend the ability of the community to pay for needed facilities; the project is funded by voter approval and ongoing maintenance will be funded by ISD's operational budget. Neither construction nor operation of the facilities will impact the City's ability to pay for needed facilities.

The project increases capacity for public education within the community to meet enrollment projections, providing improved educational "service levels" consistent with comprehensive plan goals.

The site also prioritizes the preservation of existing, mature vegetation around the perimeter of the property to ensure compatibility between uses. The project mitigates potential environmental impacts related to stormwater, traffic, hazardous materials, noise, and light through design features and mitigation measures identified in the SEPA threshold determination (Attachment 74 – SEPA MDNS).

COMPREHENSIVE PLAN CONSISTENCY CONCLUSION: The proposal is consistent with the City of Issaquah Comprehensive Plan. The proposal satisfies this criterion.

2. PERMITTED USE COMPATIBILITY

Pursuant to IMC 18.07.660(F)(2), the project is required to be compatible with permitted land uses in the vicinity of the site. The project is surrounded by residential development. As described in Section VII.A of this Staff Report, the project is designed to be compatible with adjacent land uses and land uses in the vicinity. The project complies with (or, as conditioned, will comply with) applicable building height, setback, build-to-line, impervious surface coverage, and FAR (upon approval of AAS request) requirements for buildings in the CF-F zone. Placement of schools adjacent to residential zoning and uses is compatible, and schools do not generate significant noise, pollution, and regular daily traffic that would cause incompatibility with nearby residential zones. These standards, in addition to requirements in the Design Criteria Checklist, are the minimum requirements necessary to ensure compatibility with adjacent land uses. The Applicant has also included mitigation measures to minimize any potential impacts on adjacent properties, including the retention and enhancement of approximately nine acres of existing, mature vegetation around the perimeter of the property, using buildings and retaining walls to manage topographical challenges to reduce site grading and material import/export, enclosing mechanical equipment within buildings or screening walls, placing waste receptacles in utility enclosures, and similar design measures. Right-of-way improvements will reduce potential traffic impacts in the surrounding community.

The project also incorporates high-quality architectural design and site design consistent with the Design Criteria Checklist. Buildings use modulation, articulation, changes in materials, windows, greenscreens, and similar features to break up building masses.

Materials were selected to use a muted palette and evoke connection to nature. Plant materials were selected to fit into the natural site context.

PERMITTED USE COMPATIBILITY CONCLUSION: As conditioned, the project will be compatible with adjacent and nearby land uses. The proposal satisfies this criterion.

3. ***SITE PLAN CONTENTS***

Pursuant to IMC 18.07.660(F)(3), the Applicant is required to identify the following features on the site: (1) environmentally critical areas and their buffers and setbacks; (2) future development areas; (3) areas of historical or cultural significance; (4) required buffer and setback areas; and (5) required and proposed easements. This information has been identified in the plans provided with the application materials (Attachments 97, 98, and 99 – Civil Plans, Architectural Plans & Building Elevations, and Landscape Plans).

SITE PLAN CONTENTS CONCLUSION: The proposal complies with this criterion.

4. ***DENSITY***

IMC 18.07.660(F)(4) requires specific densities to be identified for each phase of the proposed development. The Applicant is proposing an overall site FAR of 0.42 at full build-out, 0.40 without the portables but with the proposed high school building addition, and 0.38 without the portables and without the proposed high school building addition. Specific residential and non-residential densities beyond the FAR are not required for school projects in the CF-F zone.

DENSITY CONCLUSION: Upon approval of the FAR AAS and, as conditioned, the proposal complies with this criterion.

5. ***STREETS AND SIDEWALKS***

IMC 18.07.660(F)(5) requires streets and sidewalks, existing and proposed, to be suitable and adequate to carry anticipated traffic within the proposed project and in the vicinity of the proposed project. This includes sidewalks and other planning features that assure safe walking conditions for students who only walk to and from school. Transportation facilities must be adequately designed and delineated on the proposed project development site plan and must be completed by the completion date of the project.

As discussed in Sections VII.A and E of this Staff Report, the Applicant prepared a traffic study and related materials to understand trip generation and potential traffic impacts for motorized and nonmotorized traffic. The proposal will provide necessary roadway improvements, signalization, and nonmotorized infrastructure (sidewalks and bike lanes) in the 228th Avenue SE and SE 43rd Way rights-of-way. The project will also include an extensive internal network that distributes motorized traffic around the site in order of volume and minimizes potential conflicts between motorized and

nonmotorized traffic. A barrier-free route has been provided from the 228th Avenue SE right-of-way to the south side of the high school, connecting with the broader barrier-free nonmotorized network on the site.

As conditioned, the existing and proposed street and sidewalk network (as improved) will be suitable and adequate to carry anticipated traffic within the proposed project and in the vicinity of the proposed project. Frontage improvements will provide safe walking conditions within the project limits (although, as noted above, there are no nonmotorized facilities to the north of the project site). The plans clearly delineate the proposed transportation facilities (Attachment 97 – Civil Plans). Conditions of approval require the transportation facilities to be completed prior to issuing a certificate of occupancy for the project **(Condition 50)**.

STREETS AND SIDEWALKS CONCLUSION: As conditioned, the proposal complies with this criterion.

6. UTILITY SERVICES AND OTHER IMPROVEMENTS

Pursuant to IMC 18.07.660(F)(6), utility services and other improvements, existing and proposed, must be adequate for the development and must be completed by the estimated completion date of the development as designated in Covenants, Conditions and Restrictions. The proposal is not a subdivision and will not have Covenants, Conditions, and Restrictions; a condition of approval will require the completion date of the utility services and other improvements to be no later than the completion date of each phase of the project. **[CONDITION 50]**

The project design and supporting technical studies and reports have been reviewed commensurate with land use permit review. Conceptual road, nonmotorized pathway, and utility plans were reviewed for compliance with the appropriate land use standards. A detailed review of the roads, pedestrian routes, and utilities will be completed during the City of Issaquah Site Work permit(s) review and approval, and/or review and approval of related permits (i.e., right-of-way permits). **[CONDITION 51]** For development within the city limits of Sammamish, the applicant shall apply for necessary permit(s) as required by the City of Sammamish.

a. Stormwater – Flow Control/Detention and Treatment of Runoff

As described above, the project conveys stormwater runoff through both the City of Issaquah and the City of Sammamish. The Applicant submitted preliminary Stormwater Technical Information Reports (TIRs) and a summary memo to unify the documents (Attachments 53, 54, and 55 – Preliminary On-Site Stormwater Technical Information Report, Preliminary Off-Site Stormwater Technical Information Report, and Issaquah TIR/Sammamish TIR Discussion Memo), and clarify on and off-site improvements are considered as one project. The TIRs document compliance with the adopted stormwater management manuals for both jurisdictions, including adherence to requirements for flow control, detention, and treatment of runoff.

The project will be required to protect the Providence Point stormwater system during and after construction. Conditions of approval are recommended to ensure compliance. Compliance with all applicable stormwater requirements will be verified during review of City of Issaquah site work permits and City of Sammamish right-of-way permits. As conditioned, the project will meet all stormwater requirements.

b. Sewer and Water

Sammamish Plateau Water (SPW) will provide sewer and water service to the project. The applicant provided a Certificate of Sewer Availability and a Certificate of Water Availability, both dated September 15, 2020 and both valid for one year or until superseded by a Developer Extension Agreement (DEA) (Attachments 13 and 14 – Certificate of Sewer Availability and Certificate of Water Availability). SPW has entered into a DEA with the District for sewer and water service extensions (Attachment 15 – DEA Letter and Resolution). There are no known issues concerning capacity of the sewer or water systems to provide service to the proposed development (Attachment 16 – SWP Approval Letter).

The applicant has provided necessary securities as required by SPW for the extension of sewer and water facilities.

This site originally was served by its own private water system and the original water tower is proposed to be removed as noted on the Site Work permit under review. A separate demolition permit application will be submitted for the removal of the water tower.

c. Power, Phone and Cable

AT&T cellular equipment is currently located on the existing water tower in the southern portion of the property. ISD intends for this equipment to be removed by the owner. A temporary Cell on Wheels (COW) (a mobile cell tower platform) may be placed on the site. Any new temporary or permanent equipment will be installed by others under a separate SEPA process, administrative site development permit, and building permit applications.

UTILITY SERVICES CONCLUSION: As conditioned, the proposal satisfies this criterion.

7. PHASING

IMC 18.07.660(F)(7) requires each phase of the proposed development, as it is planned to be completed, to provide the required parking spaces, streets and sidewalks, recreation facilities and park land, landscape and open spaces, critical area designations and buffers, utility service areas, and rights-of-way necessary for creating and sustaining a desirable and stable environment.

The Applicant provided information about project phasing. Refer to Section VII.A of this Staff Report for additional information. Each phase of the project will provide the required parking spaces, motorized and nonmotorized circulation, accessory athletic and recess facilities, and landscape areas required for the project.

PHASING CONCLUSION: The proposal complies with this criterion.

8. SUBDIVISION

IMC 18.07.660(F)(8) requires subdivision applications to conform to the requirements of Chapter 18.13 IMC. No subdivision is proposed or envisioned.

SUBDIVISION CONCLUSION: This criterion is not applicable.

9. DESIGN CONTINUITY

Per IMC 18.07.660(F)(9), the project must achieve design continuity through repetition of certain plant species and other landscape materials, certain building materials, and other design concepts. The Applicant has demonstrated conformance with the Design Criteria Checklist (see Section VII.D of this Staff Report for additional information). The Applicant has proposed a plant palette that will be used across the entire site, with species selected to blend into the existing, native vegetation on the site. The Applicant has also provided a materials board showing materials to be used on both school buildings and at structural elements of proposed accessory buildings. Trees and boulders found on the site will be re-used as landscape elements or building finish materials. The design achieves the required continuity with the existing site context and among the various elements of the proposed development.

DESIGN CONTINUITY CONCLUSION: The proposal complies with this criterion.

10. ACCESSORY STRUCTURES

IMC 18.07.660(F)(10) requires accessory structures, including street furniture, mailboxes, kiosks and street lighting, to be designed as part of the overall project design and to provide uniformity and linkage through the site. The Applicant provided a site amenity sheet (Attachment 99, Sheet L1.10LU – Site Amenities) and example images of accessory structures (Attachment 99 – Landscape Plans) to illustrate the types of accessory structures that will be incorporated into the site. The Applicant will be required to provide accessory structures, including furnishings and lighting, that are consistent with the overall site design, shown on the appropriate construction permit, and verified with specifications and/or photographs of the final selected furnishings prior to issuing a Certificate of Occupancy for the project. **[CONDITION 52]**

ACCESSORY STRUCTURES CONCLUSION: As conditioned, the proposal satisfies this criterion.

11. NONMOTORIZED CIRCULATION

Per IMC 18.07.660(F)(11), the proposed nonmotorized circulation network is required to be consistent with IMC 18.07.080 *Nonmotorized facilities.* As described in Section VII.A of this Staff Report, the proposal will comply with the requirements in IMC 18.07.080 (upon approval of two AAS requests).

NONMOTORIZED CIRCULATION CONCLUSION: The proposal complies with this criterion.

12. PUBLIC ACCESS

Pursuant to IMC 18.07.660(F)(12), the proposal must made appropriate provisions for public access to any lakes, streams, and scenic corridors within the site. There are no lakes, streams, or scenic corridors on the project site.

PUBLIC ACCESS CONCLUSION: This criterion is not applicable.

13. SIGNAGE

Per IMC 18.07.660(F)(13), signage must have consistent elements such as color, shape, size, and graphics that maintain uniformity throughout the project. The Applicant provided signage details to demonstrate compliance with sign requirements in Chapter 18.11 IMC. The signage details indicate a similar material and color palette as proposed for building materials. The freestanding signs will be similar in size, shape, color, and design. The directional signage will be identical in terms of material, color, shape, and size.

SIGNAGE CONCLUSION: The proposal complies with this criterion.

MASTER SITE PLAN APPROVAL CRITERIA CONCLUSION: As conditioned, the proposal complies with applicable criteria for making a recommendation of Approval with Conditions.

B. Site Development Permit Approval Criteria

Pursuant to IMC 18.04.430, to decide a Site Development Permit (SDP) application, Staff prepares a recommendation to the Development Commission based on compliance of the proposal with (1) the Comprehensive Plan; (2) the standards and provisions of Title 18 and other uniform codes in effect and administered by the City and applicable jurisdictions; and (3) the criteria set forth in the Design Criteria Checklist (IMC 18.07 Appendix 2). Pursuant to IMC 18.04.440, the SDP is decided in accordance with the purpose and intent of Chapter 18.04 IMC using approval criteria found in Chapter 18.07 IMC, including development regulations, the Design Criteria Checklist, and other applicable approval criteria.

1. COMPLIANCE WITH COMPREHENSIVE PLAN

The proposal, as conditioned, complies with the Comprehensive Plan as documented in Section VIII.A of this Staff Report.

COMPREHENSIVE PLAN COMPLIANCE CONCLUSION: The proposal satisfies this criterion.

2. ***COMPLIANCE WITH STANDARDS AND PROVISIONS OF TITLE 18 AND OTHER CODES***
   The proposal, as conditioned, complies with applicable standards, guidelines, and provisions in Title 18 as documented in Section VII.A-G of this Staff Report.

   TITLE 18 AND OTHER CODE REQUIREMENTS CONCLUSION: The proposal satisfies this criterion.

3. ***COMPLIANCE WITH DESIGN CRITERIA CHECKLIST***
   The proposal, as conditioned, complies with the Design Criteria Checklist as documented in Section VII.D of this Staff Report.

   DESIGN CRITERIA CHECKLIST CONCLUSION: The proposal satisfies this criterion.

SITE DEVELOPMENT PERMIT APPROVAL CRITERIA CONCLUSION: As conditioned, the proposal complies with applicable criteria for making a recommendation of Approval with Conditions.

IX. Public Comments and Responses

The City received many comment letter(s) during the review process. Comments were solicited prior to the Community Conference held before the submittal of the land use applications (July 3, 2020 – July 23, 2020), upon determination of complete application, prior to the environmental Neighborhood Meeting (April 23, 2021 – May 1, 2021), and upon determination of complete application for the three AAS requests submitted in 2021. Comments were collected between July 3, 2020, and March 2, 2022.

Public comment identified several consistent themes or concerns, addressed below. Public comments are individually addressed in Attachment 81, Public Comment Summary Matrix, and are included in Attachment 82 (Community Conference public comments), Attachment 84 (Neighborhood Meeting public comments), and Attachment 88 (all other public comments).

C. Public Comments Key Issues or Concerns

1. TRAFFIC, CONGESTION, AND ACCESS

Traffic Congestion and Site Access. Traffic congestion on 228th Avenue SE is a frequent concern. The community has indicated that traffic is worsening, and this will likely be exacerbated by the addition of the two schools and associated vehicle trips. Congestion causes challenges for residents attempting to exit local roads and driveways onto 228th Avenue SE and, according to some comments, there is a concern that traffic congestion could impact response times for ambulances, fire trucks, or other emergency response vehicles.

The traffic study submitted by the Applicant indicates that the project will improve traffic operation on 228th Avenue SE north of Issaquah-Pine Lake Road and on Issaquah-Pine Lake Road due to changes in traffic patterns. Increased delay at the SE 40th Street intersection with 228th Avenue SE will be mitigated by a future capacity improvement to be determined by ISD and the City of Sammamish.

The project is also expected to add delay to the NW Sammamish Road/17th Avenue W and SE 56th Street/East Lake Sammamish Parkway intersections. These impacts will be mitigated by payment of traffic impact fees consistent with Chapter 3.71 IMC.

The Applicant is required to develop a Transportation Management Plan (TMP) and other traffic management-related plans **(Conditions 16, 17, and 19)** to address traffic impacts during construction and operation of the schools.

Alternatives to Driving. The community is concerned about the lack of alternative transportation modes, causing most students and parents to rely on driving as the primary or only method of getting to or from the site. The lack of pedestrian, bicycle, and transit infrastructure will, according to comments received, contribute to the traffic issues described above.

The Applicant has included the required frontage improvements, including sidewalks and bicycle lanes, and extended those improvements to tie into existing roadways in the Cities of Issaquah and Sammamish. While there will not be complete continuity in pedestrian or bicycle infrastructure from nearby neighborhoods with school-aged children, the Applicant is exceeding minimum requirements to support alternative modes of transportation. King County Metro is responsible for the transit route alignments and stop locations. Further, ISD provides bus service to reduce driving trips to the campus.

2. ENVIRONMENTAL IMPACTS

Tree Removal. The community has submitted many comments objecting to tree removal. Concerns include habitat degradation, loss of ecological functions, and aesthetic impacts on the surrounding properties.

The Applicant has requested an Administrative Adjustment of Standards (AAS21-00001) to reduce the minimum tree retention requirements from 25 percent to 23 percent. The Applicant indicates this reduction is necessary based on a unique combination of circumstances (see Section VII.A.14.m of this Staff Report for additional information) related to the property and certain code requirements. Many existing trees are in poor and declining/dying condition or are dead. The Applicant submitted a narrative explaining the project's consistency with criteria for approval of the AAS (Attachment 25 – Tree AAS Narrative) and without the dead and dying trees, the project complies with the City's retention standard.

Stormwater. The community is concerned that stormwater runoff will increase in volume and velocity, potentially impacting downstream stormwater infrastructure and local water bodies, including Laughing Jacobs Creek and Lake Sammamish.

The Applicant has designed the site and frontage improvements to comply with each jurisdiction's applicable stormwater requirements. Stormwater requirements are adopted to ensure on-site stormwater management systems perform to a pre-development condition or better, from both a water quality and flow control perspective. Consistency with these requirements will be verified during construction permit review.

Wetlands. The community has indicated that the loss of Wetland C will have significant adverse impacts on local wildlife habitat and site ecology.

The Applicant submitted critical areas reports and addenda analyzing Wetland C, its hydrologic connection to other habitat features in the vicinity, and criteria for impacting the wetland. The studies indicate that Wetland C is isolate and of poor habitat quality, and that the proposed impacts are consistent with applicable criteria in Chapter 18.10 IMC. Impacts to Wetland C will be mitigated through the purchase of mitigation credits at the East Lake Sammamish Mitigation Bank.

3. STADIUM AND SPORTS FIELDS

The community has frequently commented on the necessity and potential impacts from the proposed sports facilities, especially the stadium and ball fields. Of particular importance are noise and light impacts from activities occurring after school hours at these facilities. The community has requested ISD consider sharing facilities at Skyline High School, where the football stadium was recently renovated.

Sports facilities are typical accessory structures associated with the construction of schools and are an allowed use on the site. The facilities are required to comply with applicable noise and lighting standards and has demonstrated consistency at a land use level with those codes. Compliance of specific lighting fixtures and noise-generating equipment such as the public address system will be verified with construction permit review.

4. QUANTITY OF FACILITIES ON THE SITE

The community has questioned the efficiency of the site design. Some comments indicate that too much has been planned for a single site, while other comments indicate the use of land could be more efficient by more compactly designing and siting different project components.

The City's adopted regulations for the development of public-school facilities establish a minimum and maximum FAR for the site. The Applicant has requested a reduction in the minimum FAR, the net effect of which is to reduce the total amount of building square footage required to be built. ISD's request explains that the reduction is necessary because many of the accessory facilities associated with the schools are not counted toward building square footage but are nevertheless necessary for operational function; this includes facilities like the bus loop, surface parking, and sports facilities.

5. SAFETY

Public comments have brought up concerns related to safety and site security for neighbors. The project will include a variety of features that limit the ability of visitors to enter or exit the site anywhere other than the established vehicular and pedestrian entry points. The site is partially fenced along the perimeter and additional perimeter fencing will be installed in certain locations, such as along the 228th Avenue SE right-of-way. A combination of retaining walls, site topography, and fencing around the exterior perimeter of school facilities (but inside the site perimeter) will prevent trespass in the vegetated buffer.

6. DID NOT INCORPORATE NEIGHBOR COMMENTS

The community has indicated that ISD did not adequately incorporate comments received early in the planning process. The Applicant indicated many site changes were made to address community concerns, including expanding the vegetated buffer around the perimeter of the site, re-orienting sports facilities, and making alterations to the location or design of retaining walls and other infrastructure.

X. Proposed Motion

Based on the applications, submitted plans and technical reports, listed Attachments, and the analysis presented in this Staff Report, the Administration recommends that the Development Commission recommends **APPROVAL SUBJECT TO CONDITIONS for SDP20-00001, MSP20-00001, AAS20-00012, AAS21-00001, AAS21-00002, AAS21-00005, and AAS21-00006.** The Administration recommends the Development Commission move to:

Recommend approval of the Site Development Permit, Master Site Plan, and Administrative Adjustments of Standards for the project known as Issaquah High School #4 and Elementary School #17, File Nos. SDP20-00001, MSP20-00001, AAS20-00012, AAS21-00001, AAS21-00002, AAS21-00005, and AAS21-00006, subject to the terms and conditions of the Staff Report dated February 16, 2022, Attachments 1 through 101, and the following conditions:

A. Land Use Conditions

1. This MSP/SDP decision is based on certain fixed factors which were analyzed and served as the basis for review. These included square footage of the buildings (333,633 square feet total for both schools, not including portables), number of students and staff (2,567 and 225 respectively), and number of buses serving the school (30 total for both schools). Increases in any of these beyond these established thresholds must be approved by the Director in writing and with sufficient information to assess the impacts such as traffic level of service, parking, on-site queuing and stacking, and other potential impacts identified by the Director or Staff. The Director may impose additional conditions to address impacts caused by any proposed increases in the established thresholds or may deny such increases in the event that impacts cannot be mitigated.

   Additionally, the SDP was based on the modeled performance of the school for a number of aspects including traffic level of service, traffic operations of the access control, on-site queuing and stacking, on-site daily parking quantities, on-site and off-site special event parking procedures, and offsite queuing (228th Avenue SE). The District is required to submit and receive approval for a plan to monitor the actual performance of these factors prior to the issuance of the building permit. The plan must specify the frequency, methodology, and locational area of monitoring, and the manner and timing for reporting this to the City. If the monitoring report indicates thresholds have been exceeded, the City shall have the right to specify additional conditions to bring the proposal into compliance and/or mitigate for the impacts, and the District shall comply with such additional conditions. Exceedance of thresholds could be signaled by, for example, the intersection level of service during school periods falling below LOS D, 95th percentile vehicle queue lengths exceeding available turn lane storage capacities at the three study intersections

during school periods, on-site queuing and stacking of cars and buses spilling off-site, daily pervasive off-site parking, or failure of special event parking plans.

2. Issaquah School District shall incorporate all mitigation measures and conditions set forth in its SEPA Mitigated Determination of Nonsignificance (MDNS) for this project, included as Attachment 74 to this Staff Report. Where a conflict exists between the mitigation measures and conditions identified in the SEPA MDNS and these Conditions of Approval, the more restrictive mitigation measure or condition shall control, as determined by the CPD Director.

3. All surficial or above-grade equipment, wet and dry utilities or vaults, meters, and similar appurtenances are assumed to be shown on the project plans included in Attachments 97, 98, and 99 to this Staff Report. Anything not shown on the project plans is assumed to be located within a structure. If new or unforeseen surficial or above-grade equipment, vaults, meters, and similar appurtenances are required, the Applicant shall locate them within the building if possible. If location within a building is not possible, the addition of new surficial or above-grade equipment, vaults, meters, and similar appurtenances shall be considered a significant revision and will require a request for revision to be reviewed and approved by the CPD Director. Additional plantings, screening elements, or other visual impact mitigation measures may be required.

4. Project modifications not meeting the criteria for major modifications set forth in IMC 18.04.450 shall be considered a minor modification. The Community Planning and Development Director, or the Director's designee, will make the final decision on the Applicant's proposal(s) for minor modifications.

5. Any inconsistencies, conflicts, or incomplete information, other than those addressed directly by the Notice of Decision for the subject permits (file nos. SDP20-00001, MSP20-00001, AAS20-00012, AAS21-00001, AAS21-00002, AAS21-00005, and AAS21-00006) shall be resolved by the Community Planning and Development Director or the Director's designee, utilizing the Staff Report and in consultation with the Applicant, at the time of the future application. Additional review of details and information will take place at construction permit submittal.

6. Issaquah School District shall maintain the following facilities as community spaces available for public use, after school hours, including on weekends and during summer break: tennis courts and plaza, track and field, ball fields and plaza, elementary school playground, and other outdoor plazas. "Public use" shall mean use consistent with the existing Interlocal Agreement named "Joint Use Development and Maintenance of City and District Properties" dated May 28, 2003, or as amended, between Issaquah School District

and the City of Issaquah. The facilities shall be signed to notify community members of their ability to use the facilities and the hours allowed for use. The facilities shall be maintained as publicly accessible community spaces regardless of any agreements with the City of Issaquah Department of Parks and Community Services. If Issaquah School District must permanently close the above-listed facilities to community use, a Variance or other approval as determined by the CPD Director shall be obtained prior to closure.

7. Prior to issuing a Temporary Certificate of Occupancy for the first building permit, the Applicant shall record against the property a Native Growth Protection Easement or similar instrument over the "resource protection" community space. Prior to recording, the Applicant shall provide a draft of the instrument for review and approval by the City of Issaquah. The instrument shall, at a minimum, require permanent conservation of the perimeter buffer and shall allow regular maintenance, including removal of invasive species, planting of native species, and removal of hazardous trees presenting a strike risk to persons or improvements. Intrusion into the easement area shall be allowed for educational and maintenance purposes only.

8. Issaquah School District shall obtain a Boundary Line Adjustment to eliminate the interior lot lines on the subject property. The Boundary Line Adjustment shall be approved and recorded prior to issuance of a building permit for the project.

9. The Applicant shall install a vehicular gate at the south end of the proposed fire lane on the eastern side of the high school. The vehicular gate shall be equipped with a Knox Box or similar emergency access feature approved by the Fire Marshal or designee. This required gate may be combined, upon approval by the Fire Marshal, Recology, and CPD Director, with the gate required in Condition 23.

10. Benches shall be provided near the midpoint of the primary walkway serving each building entrance, including at least one bench along the ADA-accessible pathway in the southeast corner of the property. With construction permits, the Applicant shall include sufficient information to demonstrate compliance with IMC 18.07.080(B)(1)(d). This may be included with either the Landscape Permit or the Site Work 2 Permit; however, it shall be clearly indicated which permit is implementing the condition.

11. This MSP/SDP land use decision shall be valid for three years from the later of the date of application approval as specified in the Notice of Decision pursuant to IMC 18.04.220(D) or the resolution of any appeals, if filed. One-year extensions may be requested by the Applicant and shall be accompanied by a schedule for submittal of any remaining construction permits. Requests for extension may be approved at the discretion of the CPD Director using the criteria in IMC 18.04.220(D)(1). Determination by the City of a

complete application for subsequent construction permit shall automatically extend the validity of this MSP/SDP land use decision as long as said construction permit is active pursuant to IMC 18.04.220(D)(1). If complete applications for construction permits for future phases have not been filed by the time the high school building receives its Temporary Certificate of Occupancy, no further extensions shall be granted. At such time the permits expire, and if the elementary school has not been built, the stockpile shall be removed and the site restored and stabilized within three months, based on a removal plan approved by the City.

12. The Applicant shall incorporate erosion and sediment control measures and follow best management practices in accordance with the City's adopted stormwater regulations. The adopted regulations allow the City to require cash securities sufficient to mitigate impacts that may be created by failures of an erosion and sediment control facility. The Applicant shall evaluate the potential impact of failure and estimate the cost of mitigating such failures of the erosion and sediment control, such as of the stockpile. This evaluation and cost estimate shall be submitted to the City with the permit application materials for the first construction permit that allows the applicant to stockpile earthwork materials on the project site for use during a future project phase. Prior to issuance of said construction permit, the Applicant shall provide a letter of commitment (in lieu of a cash security) stating that the Applicant will immediately mitigate failures and resulting impacts of said failures of the erosion and sediment control facilities. In addition, at a minimum, the Applicant shall hydroseed exposed soils and install fencing around the perimeter of the stockpile to prevent unauthorized access. Fencing installed for this purpose shall be aesthetically consistent with other materials used on the campus; black vinyl coated chain link is acceptable as temporary fencing in this instance. The Applicant shall obtain a fence permit prior to the installation of the required fencing, the application of which shall include a fence detail with proposed materials.

13. The Applicant shall complete all required and proposed planting in the vegetated buffer along the perimeter of the property with the initial phase of construction.

14. The Applicant shall submit proposed regulations, user directions, marked access points, and similar information necessary to ensure site user safety for review and approval with construction permits. Proposed materials for information to be posted to a building or structure may be submitted with the building permit for that structure. Information posted around the site must be submitted with the Site Work Permit or landscape permit for the project, and shall clearly identify which permit the review should occur under.

15. Issaquah School District shall not schedule coincident or overlapping events at the Elementary School auditorium and High School Stadium if such overlapping events would

cause total parking demand to exceed available on-site parking. This condition shall be incorporated into the SEMP required in Condition 16.

16. Issaquah School District shall prepare a School Event Management Plan ("SEMP") to ensure parking demand does not exceed available on-site parking. The SEMP shall include the following provisions:
    a. Incorporate requirements of Condition 15.
    b. Issaquah School District shall provide temporary event parking in its bus and parent pick-up and drop-off areas as needed to accommodate overflow parking. Use of this area for after-hours events shall be clearly signed. If overflow parking is necessary during events, Issaquah School District shall provide parking attendants or other parking management staff to ensure visiting vehicles park on the subject property and do not park in unauthorized locations on surrounding properties and public roads.
    c. Issaquah School District shall prepare an off-site parking plan including designated off-site parking location(s) for events and shuttle service from the off-site parking location(s) to the subject property. This plan shall be implemented if event parking demand could reasonably exceed the total number of available permanent and temporary on-site parking spaces (758 parking spaces as of the writing of this Staff Report). If larger events that could reasonably exceed the total number of available on-site parking spaces are anticipated, Issaquah School District shall notify the City of Issaquah at least 14 days in advance of the event.

    The SEMP shall incorporate all recommendations set forth in the Transportation Technical Report prepared by Heffron Transportation Inc., dated February 16, 2021, and included as Attachment 60 to this Staff Report. The SEMP shall be reviewed and approved by the City of Issaquah's CPD Director prior to issuing the first Certificate of Occupancy for the project.

17. Issaquah School District shall prepare a Transportation Management Plan ("TMP") to encourage travel by modes other than single-occupant vehicles. The TMP shall incorporate all recommendations set forth in the Transportation Technical Report prepared by Heffron Transportation Inc., dated February 16, 2021, and included as Attachment 60 to this Staff Report. The TMP shall be reviewed and approved by the City of Issaquah's CPD Director and Public Works Director prior to issuing the first Certificate of Occupancy for the project. Issaquah School District shall monitor the outcomes of the TMP and report annually to the City on the outcomes and their success in achieve the TMP's objectives. If the TMP is not successfully accomplishing its goals, the CPD Director and Public Works Director shall have the right to issue additional conditions of approval.

18. The Applicant shall incorporate all mitigation measures and recommendations identified in the Transportation Technical Report included in Attachment 60 to this Staff Report. Where

a conflict exists between the mitigation measures and recommendations identified in the Transportation Technical Report and these Conditions of Approval, the Conditions of Approval shall control.

19. Issaquah School District shall prepare a Construction Management Transportation Plan (CTMP) to address traffic and pedestrian control during construction. The CMPT shall identify truck (hauling) routes, lane closures, and temporary traffic control at the site access on 228th Avenue SE. The CTMP shall require streets to be kept clean of dirt and debris from construction vehicles, identify parking locations for construction worker vehicles, and incorporate best management practices for the control of fugitive dust and noise. The CTMP shall be reviewed and approved by the Community Planning and Development Department, in coordination with the Public Works Department prior to issuance of the first construction permit for the project.

20. The Applicant shall revise the planting schedule to specify both caliper size and height size for proposed trees and the maximum average planting distance (replacing "per plan") for trees. The Applicant is strongly encouraged to reduce the use of *Cornus nuttalii sp. 'Eddie's White Wonder'* dogwood such that it is used as a specimen tree rather than a street tree. The Applicant shall also revise the planting schedule to specify the maximum plant spacing for groundcovers. The revised planting schedule shall be submitted with the Landscape Permit for the project.

21. The Applicant shall provide elevation and detail drawings for the parking structure rooftop perimeter architectural element required pursuant to CIDDS 10.5.B.2.b. The proposed architectural element shall be a minimum of three feet in height. The architectural element shall be reviewed with the building permit for the parking structure.

22. Decorative or ornamental fencing shall be provided in all visually prominent locations unless chain link fencing is necessary for safety, such as at sports fields. Where chain link fencing is proposed in visually prominent locations, the Applicant shall provide an explanation, acceptable to the City of Issaquah, documenting the safety issue necessitating chain link fencing instead of decorative or ornamental fencing. All chain link fencing on the site shall be black vinyl coated.

23. A gate shall be installed at the entry to the high school building service/waste enclosure, subject to approval by Recology. This required gate may be combined, upon approval by the Fire Marshal, Recology, and CPD Director, with the gate required in Condition 9.

24. Cast-in-place concrete walls shall be finished with an architectural treatment or texture approved by the CPD Director unless they are intentionally designed as a seating wall.

Proposed finishes shall be submitted and reviewed with the building permit for each cast-in-place wall or, if the wall does not require a building permit, with the Site Work 2 Permit for the project.

25. The Applicant shall provide a minimum of 759 replacement trees or the necessary number determined during construction permit review. All replacement trees provided to mitigate tree removal shall meet the minimum size requirements set forth in CIDDS 10.14.A.3.a: two-inch caliper for deciduous trees and at least seven feet in height for conifer trees. Trees shall be State Department of Agriculture Nursery Grate No. 1 or better. Trees shall be staked, fertilized, mulched, and protected as required in CIDDS 10.17.

26. The Applicant shall retain groupings of smaller trees (those trees that do not meet the threshold to be considered "significant trees" per the definition in CIDDS Ch. 2.2) and other natural vegetation occurring in association with the smaller tree groupings. The Applicant shall retain said groupings within the Native Growth Protection Easement (see Condition 7) area as much as possible. The Applicant shall retain a minimum of 421 total caliper inches of smaller trees in groupings and with associated natural vegetation or the amount of caliper inches of smaller trees to meet the code requirements in CIDDS Ch. 10.13.

27. The existing steep slope(s) that remain, and which have a vertical change of 20 feet or more shall be subject to the protection mechanisms for steep slopes consistent with Issaquah Municipal Code Section 18.10.580. The applicant shall provide protection mechanisms to address remaining steep slopes for review with the Sitework Permit No. 2 and shall be approved prior to issuance.

28. The project shall be seismically designed in accordance with Site Class "C" as defined in IBC Table 20.3-1 of *American Society of Civil Engineers* (ASCE) *7 – Minimum Design Loads for Buildings and Other Structures,* or as superseded.

29. The Applicant shall implement the required best management practices set forth in IMC 18.10.520(B), including but not limited to:
    - Clearing on erosion hazard areas is allowed between April 1 and November 1. No clearing on erosion hazard areas is allowed between November 2 and March 31.
    - Only that clearing necessary to install temporary sedimentation and erosion control measures shall occur prior to clearing for roadways or utilities. Clearing limits for roads, sewer, water and stormwater utilities, and temporary erosion control facilities shall be marked in the field and approved by the Department of Public Works prior to any alteration of existing native vegetation. The authorized clearing for roads and utilities shall be the minimum necessary to accomplish project-specific engineering designs and provide necessary electrical clearances.

- Clearing of trees permitted pursuant to Chapter 10.0 CIDDS *Landscape* may occur in conjunction with clearing for roadways and utilities. Retained trees, understory, and stumps may subsequently be cleared only if such clearing has been approved under this Site Development Permit and Master Site Plan (file nos. SDP20-00001 and MSP20-00001) or under a future tree removal permit.
- All development proposals shall submit an erosion control plan consistent with this section and other adopted requirements prior to receiving approval. The erosion control plan shall include hydroseeding or other erosion control methods for temporary erosion control during construction. The erosion control plan shall be reviewed and approved with the first site work permit issued for the project.
- The erosion control plan shall include temporary erosion control measures recommended in the Subsurface Exploration, Geologic Hazard, and Geotechnical Engineering Report included as Attachment 42 to this Staff Report.

30. The Applicant shall incorporate all design recommendations included in Section III of the Subsurface Exploration, Geologic Hazard, and Geotechnical Engineering Report included as Attachment 42 to this Staff Report. Verification of compliance will occur with construction permits including but not limited to: Site Work 1, Site Work 2, building permits.

31. The Wetland Mitigation Plan required pursuant to IMC 18.10.750 is the purchase of 0.04 acres of credits at the East Lake Sammamish Mitigation Bank. This mitigation plan is approved. Any changes to the proposed mitigation plan shall be reviewed and approved by the Community Planning and Development Director prior to the commencement of any wetland mitigation activity. Satisfactory completion of the mitigation plan shall be verified prior to issuing construction permits for the project.

32. Issaquah School District shall implement best management practices for the use of pesticides, insecticides, and fertilizers within 150 feet of Wetland B, including limiting the use of such chemicals. This will be reviewed and/or conditioned as part of the landscape and/or other relevant construction conditions.

33. The Applicant shall submit the Best Management Practices to be used during construction, in compliance the Critical Aquifer Recharge Area requirements, detailed in the IMC Chapter 13.29. This condition will be addressed during the Sitework Permit No. 1 permit review and approval.

34. The surface grade of any artificially filled area above a retaining wall shall be level from the top of the retaining wall to a horizontal distance equaling one foot for every one foot in height of the retaining wall. Retaining walls created above an existing retaining wall and greater than four feet in height are regulated by the International Building Code.

35. Lighting shall be provided at a minimum illumination level of 0.3 footcandles in public areas. Public areas shall be considered all those areas meeting the definition of "public areas" in IMC 18.02.180, including parking lots, nonmotorized pedestrian walkways, and plazas.

36. Lighting information submitted with the Site Work and Building Permits shall include fixture details and/or cut sheets and pole height information.

37. Pre-trip bus inspections are prohibited during nighttime hours, 10:00PM to 7:00AM.

38. Issaquah School District shall monitor noise at least twice per academic quarter at the property line for the first year of operations of each school, in addition to any monitoring required by Condition 40. Noise shall be monitored at the property line south of the bus loop, at the northwestern property line in the vicinity of the softball outfield, at the northern property line in the vicinity of the baseball outfield, at the western property line(s) in the vicinity of the elementary school building and/or portables, and at the southern property line(s) south of the stadium. Quarterly noise reports shall be submitted to the City of Issaquah for the duration of this period. If maximum allowable noise levels are exceeded, Issaquah School District shall provide mitigation for review and approval by CPD.

39. Issaquah School District shall monitor noise at the property line shared with Providence Point to verify that public address system noise and other amplified noise does not exceed the maximum allowable noise limits set forth in WAC 173-60-040. Verification shall occur at least once per academic quarter when sports events using amplified noise are held for the first year of operations and again following any adjustment or alteration of the public address system(s) and other amplified noise sources. Noise shall be monitored at the northwestern property line in the vicinity of the softball outfield, at the northern property line in the vicinity of the baseball outfield, and at the southern property line(s) south of the stadium. Noise monitoring reports shall be furnished to the City of Issaquah upon request.

40. The portable restrooms in the ball field complex shall be aesthetically screened with an architectural wall or similar treatment.

41. The Applicant shall provide an architectural canopy cover above the accessible parking stalls on the top level of the parking structure. In lieu of this cover, the Applicant may propose an alternative to provide equal accessible parking for approval by CPD.

42. Where a financial security is required, in lieu of providing said financial security, Issaquah School District shall provide a letter of commitment identifying the scope of work to be completed and the timeframe for completion.

43. The stormwater design for Street Improvements must be part of the Final Stormwater TIR or provided as an Addendum to the Final Stormwater TIR. This condition shall be addressed with the City of Issaquah Site Work 1 construction permits and City of Sammamish right-of-way permits.

44. The southwest basin stormwater system shall be designed and constructed to not adversely impact the existing storm system in Providence Point, and ensure that the historical discharges from the site into the Providence Point system are not exceeded during and following construction. This condition will be addressed during the Site Work Permit No. 1 permit review and approval.

45. Turbid runoff is not allowed to discharge to the Providence Point private detention system during construction. To protect the downstream private system, this project must provide a temporary bypass to route runoff to a temporary surface water containment system (like TESC pond, Baker tank, etc.) or other best management practice on-site during construction. The best management practice shall be reviewed and approved during Site Work 1 permit.

46. While the primary access will have a leg of the intersection extending westerly beyond the edge of 228th Ave SE right-of-way into the Issaquah City limits, the Applicant shall comply with all City of Sammamish requirements and standards regarding the design and construction of the primary intersection together with 228th Ave SE right-of-way improvements. This condition will be addressed during the permit review for the proposed traffic signal and shall be met prior the traffic signal permit issuance.

47. The Applicant shall provide supporting documents necessary to develop an interlocal agreement between the Cities of Issaquah and Sammamish to operate and maintain the proposed signal improvements at the primary access. Supporting documents include plans, figures, and similar documentation requested by either jurisdiction. Such documentation shall be provided with the Site Work permit associated with the traffic signal.

48. The Applicant shall incorporate all mitigation measures and recommendations identified in the Water Tower Lead in Soil Screening Summary included in Attachment 58 to this Staff Report and SEPA conditions 34, 35, and 36 as listed in the Final MDNS included in Attachment 74 to this Staff Report. The Applicant shall submit a Department of Ecology "No Further Action" letter prior to issuing a Certificate of Occupancy for the project.

49. The Applicant shall submit a soil management plan prepared by a qualified professional for review and approval by the City of Issaquah prior to conducting work in the vicinity of the previously-removed underground storage tanks.

50. All proposed roadway, nonmotorized pathway, utility services, and related improvements shall be completed no later than the completion date of each phase of the project. Such improvements must be inspected and verified prior to issuing the first Certificate of Occupancy for the project.

51. Conceptual road, nonmotorized pathway, and utility plans were reviewed for compliance with the appropriate land use standards. Detailed roadway, nonmotorized pathway, and utility plans shall be submitted for Site Work No. 1 and No. 2 permit review and approval. Detailed plans for improvements to SE 43rd Way shall be submitted for right-of-way permit review and approval.

52. The Applicant shall provide accessory structures, including furnishings and lighting, that are consistent with the overall site design and shown on the appropriate construction permit. Consistency with site design shall be verified with specifications and/or photographs of the final selected furnishings that are reviewed and approved by the CPD Director prior to issuing a Certificate of Occupancy for the project.